

Our Community From Now Until 2026



CONSULTATION STATEMENT

April 2019

North Bradley
Neighbourhood Plan

Contents

Glossary

1.0	Introduction and methodology	4
2.0	Early community engagement	5
3.0	Summary of findings of initial community engagement	18
4.0	Housing Needs Survey	20
5.0	Site Selection Report and Sites Community Engagement	22
6.0	The Wiltshire Housing Site Allocations Plan: Pre-Regulation 14 Discussions	29
7.0	Screening for SEA and HRA and the SEA and HRA Assessments	31
8.0	Reg. 14 formal 6-week consultation	36
9.0	Reg. 14 Consultation – summary of issues and themes	81
10.0	Analysis and conclusions	85
11.00	Final SEA and HRA Screenings	86

Appendix 1	Leaflet – First Public Meeting Invitation
Appendix 2	Initial Questionnaire Form
Appendix 3	Interaction with the village school
Appendix 4a	Sites Community Engagement Questionnaire
Appendix 4b	Advertisement for community Engagement on sites
Appendix 4c	Letter to interested parties regarding sites
Appendix 4d	Letters regarding Organ Pool Farm.
Appendix 5	Housing Needs Survey
Appendix 6	Parish Newsletter Spring 2018
Appendix 7	SEA and HRA Screening Decisions
Appendix 8	Cabinet Minutes 3 rd July 2018
Appendix 9	Correspondence with County Ecologist
Appendix 10	Research Team

Glossary of Terms

Acronym or Phrase	Definition
CA	Community Area
Community Engagement Survey	Initial community engagement survey of 2014
HRA	Habitat Regulations Assessment
LDF	Local Development Framework
LoD	Limit of development (e.g. village boundary)
LPA	Local Planning Authority (Wiltshire Council)
NDP	Neighbourhood (Development) Plan
NPPF	National Planning Policy Framework - 'The Framework' sets out planning policies for England
PC	Parish Council
Qualifying Body	Body authorized by law to create a Neighbourhood Plan. Normally the Parish Council.
Reg. 14 / 15	Regulation 14 of the Neighbourhood Plan (General) Regulations 2012 requires that a formal 6-week Consultation be carried out. Regulation 15 Requires a Consultation Statement to be submitted.
SA	Sustainability Appraisal – A wide-ranging appraisal of the impacts of policy (such as this plan) to include socio-economic as well as environmental factors.
SEA	Strategic Environmental Assessment – European legislation requiring all plans to be assessed for environmental effects. In the UK compliance with the SEA Regulations can be achieved through SA or Sustainability Appraisal which takes into account socio-economic as well as environmental factors.
SPA	Special Protection Area (for biodiversity)
SHLAA	Strategic Housing Land Availability Assessment
WCS	Wiltshire Core Strategy
WWLP	West Wiltshire Local Plan

North Bradley NDP

Consultation Statement

1.0 Introduction and Methodology

- 1.1 This Consultation Statement has been created mainly to demonstrate compliance with Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012. However, it has also been of great help to the evolution of the North Bradley Neighbourhood Development Plan (NDP) in making sense of all the community engagement data received. The Statement has been the means by which the Steering Group has been able to collect, analyse and understand community engagement and consultation data. These inputs have then been used to directly shape Plan policy. How this happened is described below.
- 1.2 The Consultation Statement provides a record of all of community engagement, including early informal meetings and an online questionnaire, as well as formal Regulation 14 Consultation that has been carried out during the course of the preparation of the NDP.
- 1.3 The Area Application consultation is not covered in detail by this Consultation Statement – however this took place in December 2016 and was managed by the LPA in accordance with the Regulations. A decision notice approving the area as the whole Parish was issued on January 5th, 2017.
- 1.4 The five main aspects of consultation recorded by this report are:
 - Early Stages Community Engagement (December 2016 – April 2017)
 - Housing Needs Survey (February 2018)
 - Site Selection
(Research: Jan 2018-February 2018, Community Engagement March 2nd- April 5th, 2018)
 - SEA and HRA Screening and Reports (May-December 2018)
 - Regulation 14 Formal Six-Week consultation.

2.0 Early Community Engagement

- 2.1 Preparation of a Neighbourhood Plan had been discussed several times during 2016 by the Parish Council. Anecdotal evidence suggested that there would be community support for such a plan and accordingly a planning consultant paid for by Government grant, was appointed in December 2016 and community engagement began soon after with the creation of a dedicated section on the parish website.
- 2.2 A group of community volunteers was recruited to begin Scoping Research in December 2016, and a basic Scoping Report was produced with the help of the planning consultant. Early in the February 2017, a leaflet inviting people to attend drop ins and more formal meetings was distributed to every household. (See Appendix 1). The Scoping Report was used as a reference document and basis for discussion at the events and a simple questionnaire was devised.
- 2.3 The locations and times of the meetings were varied around the parish and around the clock in order to enable as many people as possible to attend (see table above). Efforts were made to involve hard-to-reach groups, for example, a discussion was held at the older residents club 'Autumn Leaves'.



It was a buzzy atmosphere, particularly in the morning.

2.4 Consultation Events: March 2017

Saturday 25th February 11:00 till 13:00 and 16:00 till 17.30 Progressive Hall

Tuesday 28th February 20:00 – 21:00 Ladies Group Peace Memorial Hall

Wednesday 1st March 15:00 – 16:00 Yarnbrook Chapel

Monday 6th March 17:30 – 19:00 Progressive Hall

Tuesday 7th March 13.30 – 14.30 North Bradley Baptist Chapel

Thursday 16th March 13:00 – 14:00 Autumn Leaves Social Group for the over 50's
Peace Memorial Hall

Thursday 28th March 11:00 – 12:00 Pupils at North Bradley Primary School



2.5 Efforts were also made to contact local business interests. Most businesses on the White Horse Business Park were visited. Others were phoned. They were told about the neighbourhood plan and permission was made to circulate a global e-mail. Permission was granted by the following:

Hitachi; Renrod/ Platinum; Danone/Nutricia; Summit Chairs; L F Beauty UK, Roger Lewis Furniture; Acheson & Acheson; Atlas Genetics; Order of St John Care Trust; DTR Automotives Ltd; Shaw Trust.

"Your receptionist suggested I email you about the Neighbourhood Plan that is currently being developed by the Parish Council.

The Plan is being created by people who live and work in North Bradley. It will influence how the area develops over the next 10 years, it will control where buildings go, what type they are and what they look like. It can require developers to pay towards things the village wants as a price for development - for example facilities for recreation or minor transport developments. It can preserve key areas of Local Green Space. We very much want to hear your staffs' views about North Bradley. Danone Nutricia is a significantly sized local employer and the Parish Council would appreciate the staffs' views about the area that they work in to help shape the Neighbourhood Plan.

Might you be able to forward a global email to the staff to make them aware of the plan?

What are their thoughts about the transport system in North Bradley or maybe the retail facilities to name just two examples?

Do they also live in the parish?

What are the good things/problems about working in North Bradley?

Please tell me three things you like about the parish.

Please tell me three things you dislike about the village

Please tell me three things you would change in the village.

Please tell me three things you would like to change about the village.

Are there any other comments you would like to make?

Staff would be very welcome to respond to me in an e-mail, but they would also be most welcome to find out more at a Community Engagement event. There is one taking place soon at The Progressive Hall in North Bradley, BA14 0SA where there is plenty of parking behind the hall: Monday 6th March 5.00 till 7.00. Refreshments will be available. "

- 2.6 Sadly, despite this effort, no responses were received and none from businesses at the consultation events.
- 2.7 In order to connect with the residents, 856 flyers were delivered throughout the parish, resulting in 104 Residents attending one of the above events. This is approximately 12.15% of the parish. Steering Group members discussed the plan with people who came through the door and invited them to complete the questionnaire. Some were taken away and delivered to councilors later.

2.8 The consultation methods used by the Steering Group to engage the local community in the initial (pre-Regulation 14 Consultation) are summarised in the following table:

Who was Consulted?	Consultation Method?	When?	Numbers?
Parish Councilors	Parish Council Meetings and minutes published online	Monthly	Quorum
General Public	Parish Website	Ongoing from December 2016	Unknown
Residents	Initial Leaflet Public meetings and Drop Ins at: Progressive Hall, Yarnbrook Chapel, North Bradley Church Brokerswood Questionnaire handed out at meetings	Saturday 25th Feb. 10:30 - 12:30 and 5.00 - 7.30. Monday 6th March 17:30 - 19:30	856 leaflets distributed. 104 attendance at meetings. 350 Questionnaires distributed. 111 returned.
Older Residents	Discussion at Autumn Leaves Older People's Club	Thursday 2 nd March 2017	Unknown
Local Businesses	E mail inviting comment and involvement Visits to larger local businesses and e-mails to staff there	February 2017	11 large firms on White Horse Business Park
Statutory Consultees	Direct Consultation by e mail	See Appendix	See Appendix

- 2.9 A total of 354 questionnaires were handed out at the meetings in March 2017 and this eventually resulted in 127 forms being returned. The response rate is therefore 37% of those polled – or 20% of the parish population. A copy of the questionnaire is given as Appendix 2.
- 2.10 The responses to the questionnaire, together with the response in return from the Steering Group and possible plan policies following from this were tabulated as follows:

QUESTIONNAIRE RESULTS

Issue	Comment	Number	Plan Response / Policy
Transport	Speeding: (needs restrictions & traffic calming; Woodmarsh, Church Lane, Yarnbrook and other roads).	73	Not an issue that can be covered by formal policies of a neighbourhood plan. Community Speedwatch could be an informal policy or action
	HGV's: Restrict HGV Routes (e.g. Southwick Road). Calm Fast Traffic	53	Not an issue that can be covered by formal policies of a neighbourhood plan.
	Pavements: Many in Poor shape	48	Enhancement could be part of a developer contributions policy
	Re-tarmac Southwick Road path, Church Lane, Upgrade Westbury Road & Yarnbrook Areas	6 9 2	Enhancement could be part of a developer contributions policy
	More dropped kerbs Southwick Road		
	Westbury Road/Yarnbrook Crossings for pedestrians	1	
	Parking: Stop Parking on Pavements e.g. Church Lane, Rank Yellow lines	19	Not an issue that can be dealt with by a neighbourhood plan (This is a matter for the local Highway Authority)
Bypass Promised for years to take traffic from Parish Roads	13	Not an issue that can be dealt with by a neighbourhood plan (This is a matter for the local Highway Authority)	

Issue	Comment	Number	Plan Response / Policy
Transport Contd. >	Footpaths/Bridleways Raise awareness, better maintenance / clearance	6	Enhancement could be part of a developer contributions policy Community action could be an informal policy
	Public Transport – More Buses	11	Improvement could be a developer contributions policy
	Cycle Lanes – survey to create? Road Condition – need repairs	6	Could be part of a developer contributions policy
Development	Restrict in Parish (we have had more than our share)	20	A neighbourhood plan cannot block development
Shop/Post Office/Pub	Would like to see them back in the Parish	47	Could be part of a formal retail or employment policy
Retain Green Buffer & Green Belt Areas	Protects village being swallowed up by Trowbridge Both ends of Parish	37	Formal Landscape Setting Policy
Green Area's	Common, Green Area in Pine Walk and Ensure these are protected from developers etc.	7	The most important could be designated Local Green Space (though tough criteria apply)
Swan Pond	Make more accessible and easy to walk around	4	Could be part of a developer contributions policy Could be a community action project
Employment	Create small units in empty offices to encourage small business	1	Could be part of a formal employment policy – although this may already be covered by existing policy.
	More checks on people running businesses from home	2	This is not the role of a neighbourhood plan.
	No conversion of offices to dwellings (e.g. WHBP)	6	This could be part of a formal employment policy
Peace Mem. Hall	Drainage to be resolved in children's play area. PMH Play Area / Field	3	Could be part of a developer contributions policy
	More Play Equipment	3	Could be part of a developer contributions policy
	Cricket team for North Bradley brought back	1	Not a matter for a Neighbourhood plan.

Issue	Comment	Number	Plan Response / Policy
Dog Fouling	Not sure how to deal with this but it needs to be resolved.	22	Cannot be a formal policy. Could be subject for community action or informal policy.
Rubbish Bins/Litter	Litter on the increase - need more rubbish bins. More people with litter pick	15	Cannot be a formal policy. Could be subject for community action or informal policy.
Ditches (Gutters)	Need clearing of vegetation so water runs freely	3	Cannot be a formal policy. Could be subject for community action or informal policy.
Allotments	More required and existing site given to Parish Councils jurisdiction	2	Could be part of a developer contributions policy
Broadband	Improved turn over time	1	Not a matter for a neighbourhood plan.
Village Activities	More Required	2	Could be subject for community action or informal policy.
Parish Magazine	Only available on Parish web site – no paper copy	1	Could be subject for community action or informal policy.
Verges	More cutting	1	Could be subject for community action or informal policy
Police	More presence	1	Could be subject for community action or informal policy

2.11 In addition to the questionnaires, a member of the Steering Group circulated at the meetings, noting down comments from visitors. The following is a summary of the comments collected.

Theme	Typical Comment	Response / Policy
Ashton Park Development	The part within North Bradley parish should reflect the heritage. It could be called East Bradley or Drynham.	Could be part of a design policy for Ashton Park
	In support of Fire Service recommendations, homes within this area should be required to have water sprinklers installed. They should also have the facility for recharging electrically driven cars and have to have solar panels built -in.	These are not matters for a land-use plan and are already dealt with under other legislation.
	Consideration should also be given to installing built-in bat and nest boxes.	These are not matters for a neighbourhood plan, and duplicate controls already in place but could be part of an informal community action policy
	Part of the development should be a retirement village so that the full spectrum of our age distribution is catered for.	This would need to be justified by evidence
	Consideration should be given to the style of houses and other buildings in the new development. Should they be modern or traditional?	Could be part of a design policy for Ashton Park , although the control of the planning system over aesthetics is limited.

Theme	Typical Comment	Response / Policy
White Horse Business Park	A policy is needed to protect employment land more effectively than at present, if this is possible	Unlikely that a neighbourhood plan could add anything to the Wiltshire Core Strategy on this issue Also conversion of some units would represent brownfield development and could deliver some housing.
	A cafe might be considered for employees.	Not a matter for a neighbourhood plan.
	Cycling and walking facilities to Ashton Park, North Bradley and Westbury need improvement and good maintenance.	Could be part of a formal Developer Contributions Policy
North Bradley village	The open area between North Bradley and Trowbridge needs added protection.	Could be part of a formal Landscape Setting Policy
	Any future development of the Trowbridge Town Football Club ground needs control. Some years ago, the club applied to build a stadium on the land opposite the current location. This included a social/night club that would have attracted late night traffic and noise. A policy is needed to prevent that happening on the current site. If the club moves elsewhere then the ground should return to farmland.	The site already has a valid planning permission for the current use. Planning policy cannot block all future development. Or insist the land is returned to agriculture.
	It is possible that the village school is only viable because of pupils coming from outside the village. The Ashton Park development will have two primary schools, both with an Academy status, I believe. These may be more attractive than North Bradley school to the outside parent and consideration should be given to new housing in the village to provide more village children.	In planning, schools are justified based on population, not the other way around.

Theme	Typical Comment	Response / Policy
North Bradley Village Continued. >	Traffic on Southwick Road and Westbury Road - an increasing problem. Data from the Wiltshire Council shows it is expected to increase by 50% by 2026.	This is not a land use matter than can be dealt with by a neighbourhood plan. It is a matter for the local Highway Authority.
	Consideration could be given to a by-pass running from the Ireland junction on Southwick Road to a new roundabout junction on Phillips Way. This could be funded by development between the existing village and the by-pass. Such a by-pass could create other benefits	This is not a land use matter than can be dealt with by a neighbourhood plan. It is a matter for the local Highway Authority.
	The Baptist church would like to create a new burial ground. This should be strongly supported so that residents could be buried within the village if they so wished.	A formal burial site policy could allocate a site if land is available. Has the Baptist Church been contacted and consulted directly on this issue?
	Church lane needs attention relating to school traffic. Cars waiting for children cause air pollution and parked cars can impede the village bus.	This is not a land use matter than can be dealt with by a neighbourhood plan.
	Village bus routes need reappraisal. It may be that some circular route involving Ashton Park might be introduced.	This will be considered as part of the Ashton Park scheme under existing Wiltshire Core Strategy Policy.
	A village youth club needs to be reinstated. It may be that an increased population would make one more viable.	This is not a matter for a neighbourhood plan unless a site is available.

Theme	Typical Comment	Response / Policy
Yarnbrook	<p>Traffic on Westbury Road and Hawkridge Road is a concern for residents. There was a proposal many years ago to provide a link from Westbury road to West Ashton Road to the east of Yarnbrook. Wiltshire Council is making the improvement of A350 one of its priorities and the Council should be requested to include a Yarnbrook by-pass in its considerations.</p>	<p>This is not a matter for a neighbourhood plan but is something for the Parish Council to take up with the Highway Authority if it wishes to do so.</p>
	<p>Hawkridge Road is suffering heavy goods traffic that cannot cross the railway bridge at Westbury station. Wiltshire Council should be asked to consider a single lane signal-controlled scheme over the bridge to remove the weight restriction. This would also enable them to widen the footway which currently is only about 1.00m wide, very unsatisfactory. This would enable lorries to access the West Wilts Trading Estate from the town.</p>	<p>This is not a matter for a neighbourhood plan but is something for the Parish Council to take up with the Highway Authority if it wishes to do so.</p>
	<p>In the interim, the existing Petrol Filling Station at Yarnbrook should be supported as providing a useful village shop.</p>	<p>A neighbourhood plan cannot require one business is given special treatment.</p>

Theme	Typical Comment	Response / Policy
Brokerswood	Internet and mobile phone reception is reported as not good.	This is not a matter for a neighbourhood plan
	Future planning conditions on the Country Park site need consideration.	This is not a matter for a neighbourhood plan as the permission has been granted.
Housing	<p>Extra housing could support the school, the Rising Sun pub and a possible shop associated with the pub.</p> <p>Extra and younger population could make football and cricket teams more viable. These are the sort of activities that make a village feel like a village</p> <p>Some retirement properties should be permitted within the village to allow residents to stay in the village as they grow old</p> <p>The provision of new houses needs consideration. Should there be some low-cost houses accepted?</p>	<p>It is for the community to decide whether it wants to allocate any housing. If sites can be identified they will need to be assessed before including in any plan. If so these would be in a formal sites policy</p> <p>This could require the allocation of housing sites.</p> <p>This would have to be viable based on demonstrated need.</p> <p>Core Strategy Policy 43 already requires a proportion of homes to be affordable.</p>

Theme	Typical Comment	Response / Policy
<p>General Points</p>	<p>Note that the Wiltshire Council Strategy goes to 2026 and we should be looking a bit further ahead.</p>	<p>A 10-year timescale is a reasonable one. A longer one is possible if the community wishes but it would need to be based on good evidence. The Core Strategy evidence base and projections only run to 2026.</p>
	<p>The Neighbourhood Planning responsibility needs nature to be considered in detail. As well as the general farming landscape, there are various areas that could be considered as significant wildlife sites. These are the flood relief pond at Yarnbrook, the landscaped sites in the White Horse Business park and the railway embankments.</p> <p>Consideration should be given to a professional review of the sites, possibly by Wiltshire Wildlife Trust, to allow an informed wildlife policy to be set down. Importantly, bats have been detected in the Ashton Park area and I have seen bats in my own garden in the middle of North Bradley, so they may be more common than expected.</p>	<p>These matters are already covered by Core Strategy Policies (e.g. 50 and 51) and by National policy and legislation.</p> <p>Specific action could be the subject of an informal policy.</p> <p>Bats are protected by EU and UK law. There is a known SAC nearby.</p>

3.0 Summary of findings of initial community engagement

- 3.0 The outputs of the initial community engagement were subsequently used to create the following:
- i. Suggested Draft Vision
 - ii. Suggested Draft Plan Objectives
 - iii Draft Policies
- 3.1 The Vision and Objectives, both aspirational as well as practical, were subsequently transferred to the emerging draft NDP document, while the Policy suggestions were merged with the comparable list created by the Scoping Research before also being incorporated in the draft Neighbourhood Plan.
- 3.2 Based on the initial responses from the community the suggested draft Vision is:

NDP DRAFT VISION

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

The Parish will have secured benefits from development, including the Ashton Park Strategic Site, in terms of provision of new and upgraded infrastructure. The Strategic Site will have reflected local character, culture and history in its design and will have become an integrated and functioning part of the Parish.

Local facilities, including pubs and shops and recreational and open space will have been provided or preserved. The Parish will be cleaner and, where possible, provide a better habitat for nature. There will be an improved and better maintained transport network including foot and cycle paths and speeding vehicles will have been reduced and pedestrian safety improved.

- 3.3 Similarly, the Draft Plan Objectives below directly reflect the wishes of the community. These too are aspirational as well as practical in nature and cover a wide range of issues, not all of which fall within the scope of land-use planning. Ways of achieving the objectives may therefore include informal policies for community action as well as the formal town planning policies. Action may then be taken forward on non-planning matters through actions such as habitat improvement, community speedwatch, litter picking, led according to the agreed plan by the Parish Council:

DRAFT NDP OBJECTIVES

1. To preserve the rural setting and identity of North Bradley, in particular the open spaces between the village and Trowbridge, but also existing cherished green open spaces.
2. To improve transport for residents including:
 - * Reducing vehicle speeds
 - * Improving parking
 - * Improving sustainable transport including bus services and the creation and maintenance of the network of paths and cycle-ways.
3. To influence the detailed planning of development, especially the Ashton Park Strategic Site to ensure the Parish community benefits in terms of improved infrastructure.
4. To encourage and support community facilities such as shops, pubs, places of entertainment and leisure and new and existing open space.
5. To protect and improve the natural and built environment in terms of habitat for wildlife but also the living environment for people in terms of litter and cleanliness.
6. To enhance and protect where appropriate community facilities and assets, for example recreation areas, and to provide a site for a new non-denominational burial ground within the Parish.
7. To help ensure an adequate supply of new homes, especially for young people and others struggling to afford their own home.

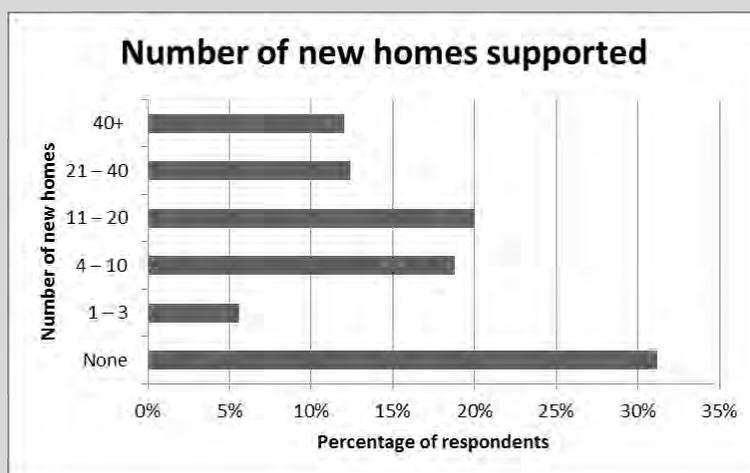
4.0 Housing Needs Survey

4.0 in Autumn 2017, Wiltshire Council officers discussed carrying out a rural housing needs survey (HNS) with North Bradley Parish Council, to establish if there was a proven need for affordable housing in the parish. As the HNS constituted consultation with the community the full HNS report is given as an Appendix in the Consultation Statement (CS) accompanying the neighbourhood plan.

4.1 In order to carry out the housing needs survey, questionnaires were delivered to the Parish Council for distribution on the 13 November 2017. To encourage a good response, households were given a pre-paid envelope in which to return the completed survey. The council applies the data protection policy to responses, ensuring that all survey responses remain anonymous. Residents were asked to return the completed surveys in the pre-paid envelopes by 18 December 2017. The forms were recorded and analysed by the Service Development Officers at Wiltshire Council.

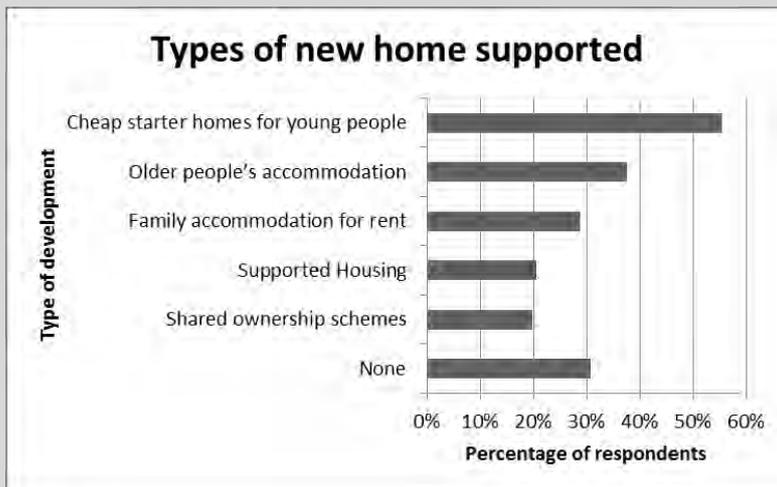
- A total of 767 questionnaires were distributed to the parish.
- Everyone was asked to complete the first section of the form.
- If a household considered itself in need, or likely to be in need of affordable housing within the next five years, it was invited to complete the rest of the survey.
- There was a good response rate of 34.0% with 261 replies received.
- This report describes the views only of the residents who returned the questionnaires and these views may not be representative of the wider population of North Bradley.
- 6 responses were made online.

4.2 The HNS questionnaire asked how many new homes people would support. The majority of respondents (68.8%) were in support of some new housing in North Bradley, with the most popular option (20.0% of respondents) being for between eleven and twenty new homes. 31.2% of respondents were opposed to any new housing in North Bradley parish:



4.3 In terms of type of new housing

Respondents to this section were finally asked what types of housing development, if any, they would support. The types of housing considered most needed in North Bradley by the survey respondents were affordable starter homes for young people (55.5%) and older persons' accommodation (37.7%). Full results are given in the chart below (more than one answer could be given):



4.4 In terms of the amount of local affordable housing need, the survey found that this was low- just one affordable home. A number of those wanting homes preferred to buy their own.

Subsidised rented housing	None
Shared ownership / discount market homes	1 x 1 bed
Sheltered housing for older people	None

4.5 The full HNS is given in this Consultation Statement as an Appendix. It is discussed in the Site Selection Report (SSR).

5.0 Site Selection Report and Community Engagement. March 2nd – April 5th, 2018

5.0 Introduction

Because the views of the community were considered to be vital to site selection, separate community engagement was undertaken by the Steering Group on a draft Site Selection Report (SSR) . This is available as a separate and accompanying document to the NDP. The draft SSR was based on a wide range of data, including the HNS described in the previous section of this CS, but the community were also invited to submit alternative sites for consideration.

5.1 Community engagement on the SSR took the form of a questionnaire (given as Appendix 4a in this Consultation Statement together with a copy of the press notice advertising it - Appendix 4b).

<http://www.wiltshiretimes.co.uk/news/16068642.north-bradley-residents-urged-to-have-their-say-on-neighbourhood-plan/?ref=mr&lp=9>.

5.2 This was delivered to all households Friday 2nd March, with a closing date for replies of 29th March. Drop-in events were held at North Bradley Baptist Church on Friday 16 March 5.30 – 7.30 p.m. and Saturday 17 March 10.00 – 12.00 a.m. and 2.30- 4.30 p.m.

5.3 A letter was sent to all landowners and developers on 8th March inviting them to respond to the SSR and enclosing a copy. A cut-off date of 29th March was given. An example of the letter is given here as Appendix 4c. The sites community engagement was advertised on the parish website and in the parish newsletter, published on 12th March 2018 (see Appendix 6). Copies of the SSR, Scoping report (SR) and Housing Needs Survey (HNS) were also placed on the website.

5.4 In the event, responses were considered from all sources until 5th April 2018.



A drop-in event during the Sites Consultation

5.5 Results

734 questionnaires were hand delivered and 32 posted to more remote addresses – a total of 766. Around 98 more were handed out at the drop-in events, giving a total of 864. Returned completed forms amounted to 111, a response rate of 12.84 % - which is disappointing. On the other hand, residents had also had to respond to the HNS consultation and so may have been suffering from 'consultation fatigue'.

5.6 Nevertheless, some interesting and helpful comments were received, and two new sites were suggested for consideration.

The results of the community engagement can be broken down into:

General Comments on Housing and Quantity Required

(Questions 1-3 and 6 of the questionnaire plus drop in event comments)

A majority of people felt that more housing was needed (59 for 46 against). However, there was much stronger support for housing for local need than for housing to meet the needs of the open market (19 for, 81 against).

In terms of the amount of housing thought appropriate, of the 106 who answered this question, 16% felt that no more housing should be allowed at all. The most popular option was for 11-50 homes (46% of respondents), only around 12% would be happy with more than 50 new homes.

Regarding what type of housing would be appropriate for North Bradley there was strong support for affordable housing (over 51% of respondents to this question). Other comments indicated that the following would be acceptable:

- Housing for young people and families ('and not mansions')
- Bungalows
- Units of 1 and 2 bedrooms.

5.7 There seemed to be a general dislike of dense, red-brick housing estates and a desire for lower-density village-style development (one respondent suggested something along the Dutch model, with lots of open space). Homes should be of the right type to meet the needs of the elderly who might want to downsize and live locally.

5.8 Main Themes

The comments formed interesting reading. The following themes emerged (in approximate order of importance, most important first).

Preservation of village identity and separation from Trowbridge

Overwhelmingly the most important issue to respondents was the need to keep North Bradley physically separated from Trowbridge by open fields and not let it become 'swallowed up as a suburb of Trowbridge'. Wiltshire Core Strategy Policy 29 (para 5.150 invited residents to consider this issue in any neighbourhood plan. Consistent with earlier community engagement, it seems that the response from the community is clear: preservation of an open landscape gap between North Bradley and Trowbridge is essential in order to preserve the rural setting and separate identity of North Bradley as a village.

5.9 Main Themes (Continued) >

Traffic issues

Traffic issues raised include congestion and traffic levels already experienced in the village and the lack of capacity to absorb any significant new development. Road safety was also raised as a problem.

Preservation of wildlife, green spaces and open fields.

There was concern that development in open countryside would harm wildlife and destroy the rural setting for the village. Many respondents referred to the desirability of using brownfield land in Trowbridge first, although in fact the HSAP does already consider this. The proposals in that document are therefore additional to any brownfield sites that can be used and reflect calculated need including that of a growing population. In other words, some greenfield land will be required.

Lack of local infrastructure constraining development (sustainability)

The lack of local amenities was pointed out (shops but also the capacity of the village school). Development should be concentrated closer to Trowbridge in accordance with the WCS. This reason seems to have been behind the support for strategic sites 3565 (Southwick Court) and 613 (Elm Grove Farm).

Scale and nature of development

Respondents felt that large scale development was not appropriate to a village in terms of the likely density and type which would be out of keeping with the lower density nature of North Bradley. People wanted North Bradley to look and feel like a village and not have something that was obviously a housing estate tacked onto it. There was acceptance of some housing, but smaller, integrated schemes and a modest overall quantum were preferred.

5.10 Scoring of draft SSR Sites

The scores for the sites were as follows, most popular first:

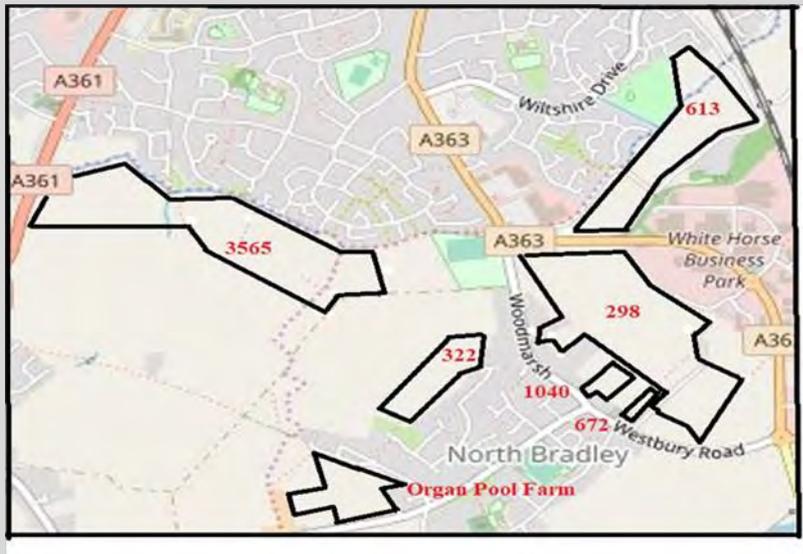
Elm Grove Farm	SHELAA 613	536 (1)
Southwick Court	SHELAA 3565	418 (2)
54 Woodmarsh	SHELAA 1040	324 (3)
Paddock Little Common Lane	SHELAA 672	322 (4)
Land Off WHBP	SHELAA 298	310 (5)
Park Farm	SHELAA 322	279 (6)
Organpool	N/A	265 (7)

It is noticeable that the most popular sites are those immediately adjacent to Trowbridge. The least popular seem to be those perceived to be in the open countryside. Additionally, those respondents closest to a particular site seem to have been likely to be those most opposed. It is interesting that Park Farm 322 scores lower than Land Off WHBP 298, despite the latter being much larger and drawing a number of hostile comments. Looking at the comments on the forms this may partly reflect some confusion where people thought that the option of site 298 referred to developing the WHBP itself (which is not an option but would be popular). The apparent unpopularity of the Park Farm may therefore not be as great as indicated. See detailed site comment summaries below.

5.11

Draft SSR Sites (comments on individual sites):

Question 4 of the questionnaire plus drop in event comments



Map from Open Street

5.12 Elm Grove Farm SHELAA 613

While not all respondents supported this site, those that did cited proximity to Trowbridge, availability of infrastructure and lack of interference with landscape separating North Bradley from Trowbridge as reasons.

5.13 Southwick Court SHELAA 3565

Reasons for generally supporting this site were similar to those for Elm Grove Farm; proximity to Trowbridge, availability of infrastructure and lack of interference with landscape separating North Bradley from Trowbridge as reasons. Because the site was acceptable to the community the landscape diagram produced in the Landscape and Visual Setting Analysis Report was revised to exclude the site from the proposed landscape protection area (Policy 1 in the NDP). The revised diagram was included in the NDP.

5.14 54 Woodmarsh SHELAA 1040

The owner contacted the Steering Group to say that, contrary to the draft SSR, the site WAS available. There were few comments regarding this site, although in terms of scoring it was relatively popular (the most popular small site in fact). Negative comments concerned possible highway impacts and the need to keep any development of moderate scale.

5.15 Paddock Little Common Land SHELAA 672

Again, there were few comments directly concerning the site. It scored 4th out of 7 in terms of popularity.

5.16 Land Off WHBP SHELAA 298

This site was unpopular, with numerous negative comments. In particular the impact on the landscape and rural setting of North Bradley and the fact that the large scale would effectively make North Bradley a suburb of Trowbridge. Village character and local distinctiveness would be lost for ever. There were also concerns about impacts on nature and on traffic congestion on nearby roads, which already have queuing traffic at busy times.

5.17 Park Farm SHELAA 322

This site did not score well in terms of popularity. This seems to have been based on a fear of reducing the Greenfields between North Bradley and Trowbridge as well as access issues (some residents opposed the Oak Drive potential access on the grounds that this would harm the village green-status land there, others (possibly nearby residents) opposed the Orchard Way access for impacts on traffic and residents).

5.18 Organpool Farm N/A

This was easily the least popular site. Respondents cited access and highway issues, impact on green fields and over-large scale as objections along with concerns over lack of infrastructure and general un-sustainability of the location. The proposed size was also larger than the maximum for all housing sites preferred by the community. Following the site surveys a letter was received from the owners of this site. This and a response from the Steering Group is given as Appendix 5d.

5.19 During the process of site selection, the prospective developer of Organ Pool Farm made a presentation at a public meeting at the Parish Council. This meeting served to re-enforce the unpopularity of the scheme, with numerous objections and concerns being raised, during and after the meeting. This played an important role in eventually deciding not to select this site. Although in any case found unsuitable under other criteria, there was a concern that public opposition to the site could risk failure of the plan at Referendum. The Tattenhall Judgement (qv) had established that such a site was not a 'reasonable alternative' and could therefore be discounted.*

5.20 **New / Alternative Sites**

(Question 5 of the questionnaire, drop in event comments and direct representations)

Land off Westbury Road, Yarnbrook

During the community engagement this site of 1.78 hectares was put forward by its owners, confirming that it was available and with a suggestion that it could accommodate between 50 and 62 houses.

This site is considered in the Site Selection Report. It was subject to a one-off site survey following the community engagement. This is given as Appendix 10 in the SSR.



* Case No: CO/15278/2013. Neutral Citation Number: [2014] EWHC 1470 (Admin). 9th May 2014. The Hon. Justice Supperstone

5.21 Land off Church Road.

This site of 2.93 acres or 1.184 hectares was put forward by the owner. It is discussed in the SSR.



5.22 **Conclusions**

The above responses were considered by the Steering Group and planning consultant. An explanation of this is given in the SSR which was updated following the community engagement to produce the final version of that report.

- 5.23 Broadly speaking, the results of the community engagement reinforced the main impressions generated by the earlier general community engagement in terms of general issues and the predominant need to maintain a landscape setting and gap between North Bradley and Trowbridge.
- 5.24 The community is not opposed to all development in principle. The preference was for schemes of moderate scale of between 11 and 50 new homes, including a high level of cheaper smaller units and a significant number of affordable homes. Smaller, low-density schemes likely to reflect local character and be easily absorbed into the village were preferred, rather than high-density housing estates.
- 5.25 One matter of concern was the apparent lack of realisation among some respondents that growth is inevitable and that a better overall result could be achieved for the community by planning creatively but carefully to make the best of this. This is perhaps not surprising since the community had not at this point seen a draft of the NDP, which could make such a balanced argument more clearly.
- 5.26 In particular the need to sacrifice some land for housing to 'plan positively' as required by the NPPF in order to have a viable NDP capable of protecting the main landscape gap between North Bradley and Trowbridge, was not fully grasped. This vital issue of creating balanced and sustainable development is explored more fully in the NDP.
- 5.27 The one site suggested by the draft SSR (sections 1-3 of that document) did not prove to be popular, however this must be seen in the context of the need to explain the overall strategy of the plan more fully to the community as described above, and a probably misconception that the reference to White Horse Business Park in site 298 caused some people to think that this meant the re-development of the brownfield land of the actual business park which is not the case. Such a scheme, if it existed, would have been popular, so making the ranking of this site higher than it should be.

- 5.28 On the other hand, two fresh sites were put forward, and one site (54 Woodmarsh, 1040) was found to be available, contradicting earlier research.
- 5.29 As indicated in the SSR, the wishes of the community are a key component in site selection, not least because the NDP will have to pass a referendum. On the other hand, the validity of the entire plan depends on it planning positively and creating a balanced strategy aimed at delivering sustainable development. A balance has therefore to be struck and difficult decisions made.



6.0 The Wiltshire Housing Site Allocations Plan: Pre-Regulation 14 Discussions

- 6.0 The North Bradley NDP has the mischance to be emerging at the same time as the Wiltshire Housing Site Allocations Plan (HSAP) – Wiltshire Council's draft plan aiming to provide additional sites for housing following on from the Wiltshire Core Strategy. Three sites were proposed in or partly in the parish. Two of these were at the edges of the parish and were unopposed by the Steering Group, as they are likely to be found acceptable in planning terms and neighbourhood plans cannot legally block the delivery of strategic sites. These sites were:

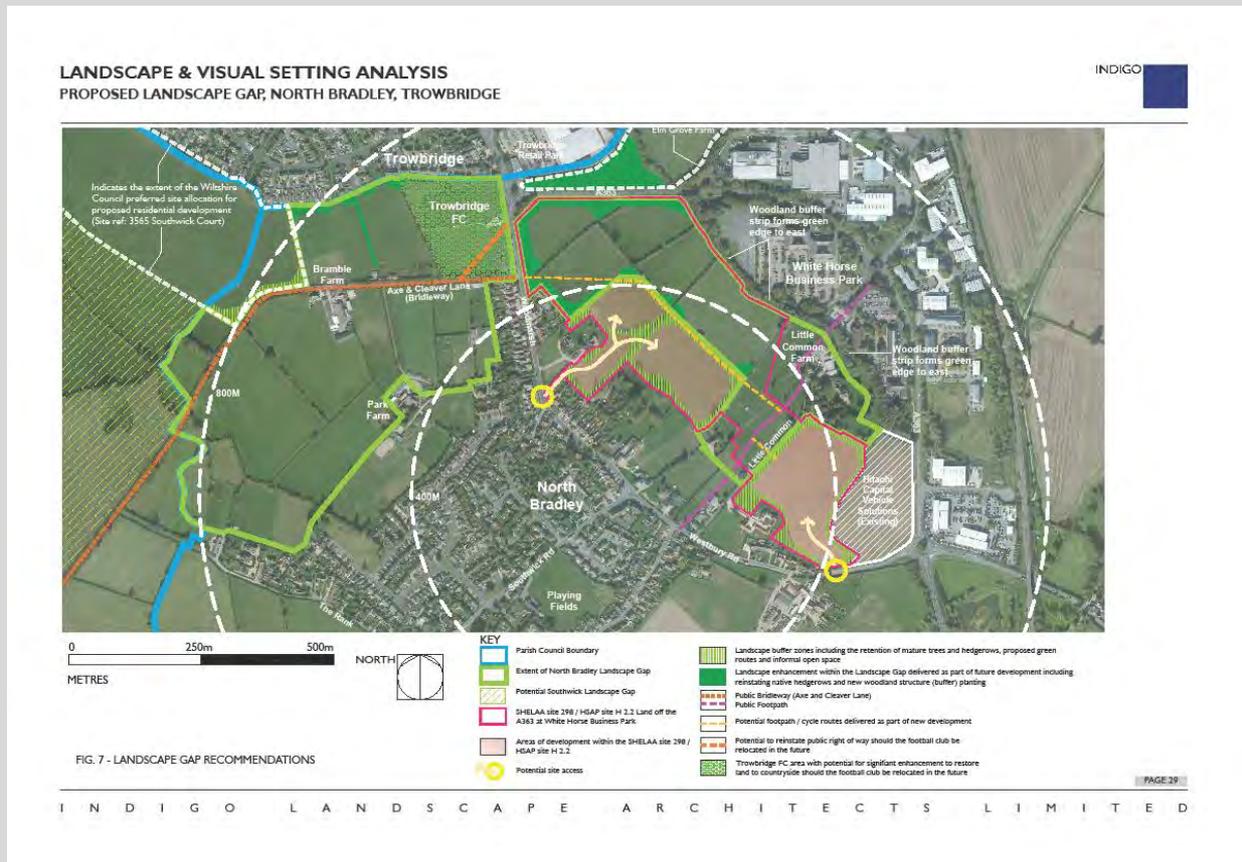
SHEELA 613/ 248	HSAP H2.1 Elm Grove Farm
SHELAA 3565	HSAP H 2.6 Southwick Court

These sites are discussed more fully in the Site Selection Report (SSR) and the accompanying Landscape and Visual Analysis Report produced by landscape consultants.

- 6.1 The third site SHELAA 298 / HSAP H 2.2 'Land off White Horse Business Park' is also discussed in the SSR and the sperate Landscape and Visual Setting and Visual Analysis Report. This is a large site, which, as originally proposed, would have obliterated a large part of the landscape gap between Trowbridge and North Bradley and almost linked the two settlements. It would also have been likely to have a significant effect on the bats of the SAC.
- 6.2 The Steering Group therefore strongly opposed this site and made submissions to this effect in the early consultation round of the HSAP, pointing out that imposing the site would effectively undermine local democracy and the NDP. However, these responses were ignored and in fact the proposed numbers for the site increased from 150 to 225. Nevertheless, thanks to the intervention of local councilors Horace Prickett and Richard Gamble, and questions raised by Steering Group member David Feather, the matter was discussed at Wiltshire Council's Cabinet on 3rd July 2018. Subsequently, discussions were held with planners at Wiltshire Council. The number of homes was reduced from 225 to 175 and it was agreed that a larger landscape gap would be left separating North Bradley from Trowbridge. (See Cabinet Minutes Appendix 8).
- 6.3 The matter of the layout of site 298 / H 2.2 was discussed with Wiltshire Planners, the County Ecologist*, the Steering Group (advised by the planning consultant) and the landscape architects at a meeting at County Hall in August 2018. A range of options was considered, and a layout eventually adopted that provided an acceptable separation between North Bradley and Trowbridge and which created a 'dark Corridor' for the bats.
- 6.4 The Steering Group would have preferred that site 298 / H 2.2 was dropped from the HSAP. However, the Neighbourhood Plan cannot legally block a strategic site and, had it attempted to do so, it is likely that it would have failed at Examination; wasting public money and a lot of volunteer time. Such an outcome would also have left North Bradley vulnerable; without a plan and relatively unprotected from speculative developments.

* Correspondence from the County Ecologist is given as Appendix 9.

6.5 The result presented in the SEA draft of the NDP therefore represents the best possible outcome under preset circumstances, rather than the ideal outcome that the Steering Group would have wished for. Nevertheless, it is an outcome which retains the separation of North Bradley from Trowbridge, which protects wildlife, and which ensures a workable neighbourhood plan; protecting the village from developments elsewhere and ensuring that the community benefits financially* from any development that does happen.



Site layout for HSAP site H 2.2 SHELAA 298 and landscape Setting Area for North Bradley following community engagement and meetings with Wiltshire Council planners, the Steering group and the County Ecologist. **This was later revised following Regulation 14 Consultation (See Section 8).**

* Communities with a neighbourhood plan get a substantial increase in the Community Infrastructure Levy (CIL) funds that come from development schemes. This money will come to the parish council to be spent in accordance with the wishes of the community as expressed in the NDP. This will result in very substantial improvements in local infrastructure.

7.0 First Screening for SEA and SEA and HRA Assessments

7.0 SEA Screening

Wiltshire Council carried out consultation on a draft Screening Decision and responses were received from the statutory consultees, all concluding that a SEA was required. Wiltshire Council later issued a Screening Decision in July 2018 (Appendix 7). This agreed that a SEA (Strategic Environmental Assessment) and HRA (Habitat Regulations Assessment) (the AA or 'Appropriate Assessment') would be required, primarily because the NDP allocates sites for housing and these could have impacts on both heritage and the bats of the Bath and Bradford on Avon SAC.

Comment: **The Paddock** site is cramped, and it would be difficult to achieve a satisfactory design. Heritage concerns were also raised by Historic England and the LPA's conservation Officer during SEA Screening. These are recorded in the Site Selection Report. The Screening Decision is also given here as Appendix 7.

Response: It was decided to drop this site from the draft plan. It could be reconsidered at a future plan review if proposals came forward that addressed the concerns.

Comment: **Park Farm.** Mitigatable risk to heritage assets. Agree. The plan already mentions this. Care would be needed in design to protect Woodfield House.

Comment: **54 Woodmarsh**
Care would be needed with design to protect Kings Lodge / Progressive Hall

Response: Agreed. This is already mentioned in draft policy

Comment: **Westbury Road, Yarnbrook**
An FRA may be required

Response: Disagree – not at this stage. All of the proposed site is in FZ1.

Comment: Possible impact on non-listed heritage assets

Response: Include mention of need to take account of in design of any proposals
Particularly in relation to settings of Mill House / older cottages on Hawkridge Road.

Comment: **The Bath and Bradford on Avon SAC**
The sites in the plan were felt to have the potential to affect the SAC

Response: Understood. A SEA and HRA will be carried out.

7.1 Before the Regulation 14 stage, extensive discussions were held with the County Ecologist. These also involved the firm of landscape architects (Indigo Landscapes) acting as landscape consultants for the Steering Group. The latter were advised by the community's planning consultant 'PlanningStreet'. Alternative options for site layout were discussed and an option selected that was specifically designed to minimise harm to the bats and maintain a good and meaningful degree of separation of North Bradley from Trowbridge. **Wiltshire Council later changed its mind about this layout during the Regulation 14 consultation.**

7.2 The outputs of the above process included a revised landscape map showing proposed site layout for site 298 / H 2.2 (above), a revised Landscape and Visual Analysis Report and a revised Neighbourhood Plan document. These updated documents were then supplied to the AECOM consultants tasked with carrying out the Strategic Environmental Assessment (SEA). The planning Consultant worked with AECOM to produce the SEA Scoping Report.

7.3 SEA Scoping Report – Consultee responses

The Statutory Consultees were consulted by AECOM in September 2018. They were sent the Scoping Report (This is included within the SEA Environmental Report and is available as a separate document accompanying the NDP) and given 5 weeks to respond. The responses to the Scoping Report were as follows.

Organisation	Comment	Response
Environment Agency	<p>Page 15 (table showing relevant plans for flood risk) – Environment Agency Flood Risk Maps – this could be split into ‘EA Flood Zones’ and ‘Flood Map for Surface Water’, to be more specific and more accurate.</p> <p>Page 46 – we support the exploration of the questions raised / objectives in the first two rows of the table.</p>	Comment Noted. Maps will be split according to recommendation in any iteration.
Historic England	No comments received on the Scoping Report.	N/A
Natural England	Maintain and improve the landscape for bats associated with the Bath and Bradford on Avon Bat SAC and/ or Picket and Clanger Wood SSSI?	An additional SEA objective was included in the SEA framework

7.4 **SEA Environmental Report (before Reg 14 Stage) Conclusions**

The following is a summary of the SEA Environmental Report conclusion, Published in October 2018. The full Environmental Report is available as a separate document accompanying the NDP.

7.5 **Sites:**

The SEA Environmental Report commented on all sites and concluded that the sites selected at the Regulation 14 Stage:

- Park Farm
- 54 Woodmarsh

Were environmentally sound as was the overall approach taken to housing:

'It is considered that medium scale growth that integrates with the settlement ...can support improvements to transport infrastructure, and maximise opportunities to enhance active travel within the NBNP area. Medium growth focused around the existing settlement area allow the settlement to grow sustainably, without detracting from the character and identity of the village or the wider setting of the Parish.'

7.6 **General SEA Conclusions**

Theme	Comment
Biodiversity	'solid basis for the protection and enhancement of habitats and ecological connectivity in the Neighbourhood Plan area and supports the Wiltshire planning framework with localised biodiversity opportunities and protections that support ecological connectivity in the wider context'.
Land and Soil	'Whilst development will not lead to the loss of highest quality 'best and most versatile' agricultural land (Grade 3a and above) the loss of soil resources is considered to have the potential for minor long term negative effects on this SEA theme'... the NBNP is likely to lead to a neutral effect on the baseline in terms of waste.
Water Resources and Flood Risk	'It is considered that the Neighbourhood Plan is likely to have an overall neutral effect on the water resources and flood risk SEA theme'.
Climate Change	'It is considered that the Neighbourhood Plan will have an overall neutral impact on the climate change SEA theme.'
Historic Environment	'Overall it is considered likely that the NBNP will lead to residual neutral effects on the historic environment'.

Theme	Comment
Landscape	<i>'Overall it is considered that the proposed spatial strategy and policy provisions enhance local landscape protections and seek to proactively manage the issues arising for development in the north of the Plan area, with the potential for long term positive effects'. This finding essentially supports the NDP's policy 1 which establishes a landscape gap.</i>
Population and Housing	<i>'The Policy seeks to deliver housing that will meet localised needs and aspirations arising from evidence such as the Housing Needs Survey and community consultation; and as such is also considered likely to lead to long term significant positive effects for the population and housing SEA theme'.</i>
Theme	Comment
Community Wellbeing and Health	<i>'Overall it is considered that cumulatively the protection of local green spaces, alongside enhancement of community facilities, the delivery of new housing and the targeting of development contributions are likely to lead to long term significant positive effects for community health and wellbeing'.</i>
Transport	<i>'On balance it is therefore considered that the Neighbourhood Plan is likely to have an overall significant positive effect on the transport SEA theme'.</i>
Economy and Enterprise	<i>'Overall it is considered likely that the NBNP will lead to indirect minor positive effects for this SEA theme'.</i>

7.7 Overall SEA Conclusion

The SEA concluded (9.41):

'Overall the appraisal of the NBNP has not identified the potential for significant negative effects...' It added (9.46);

'Overall it is considered that the NBNP takes a proactive approach to delivering new development whilst protecting key aspects of the natural and built environment that contribute to the overall quality of place and living in this area. The NBNP seeks to proactively address the cumulative effects arising from implementation of the HSAP alongside the NBNP and seeks to reduce the potential for negative effects in this respect, whilst maximising the potential for positive effects arising'.

In particular the positive impact of the NDP on housing, community health and wellbeing, transport, landscape and, with amendment, biodiversity were clear.

7.8 The SEA therefore gave the NDP a 'clean bill of health' and the SEA Environmental Report and its Scoping Report consultation responses made only 2 recommendations for changes:

1. That the NDP should seek to deliver an overall net gain for biodiversity.
2. That the flood risk maps should be split into river and surface water flooding.

7.9 Changes made to the NDP and Scoping Report following SEA

Two changes were made:

- The wording of Policies 2, 3, 5, 6 and 7 were amended to help deliver a net gain for biodiversity as suggested by the SEA. Chapter 10 (Monitoring) was also amended to suggest possible monitoring for biodiversity.
- Flood Risk Maps were split into river and surface water flooding in all relevant documents.

7.10 **First HRA**

The Screening had established that an HRA would be required. The HRA (or AA) was duly carried out and a statement received on 12th December 2018. This is available as a separate document accompanying the NDP. This considered the effects of the NDP on European sites of significance to wildlife. The only two relevant sites were:

- The Bath and Bradford on Avon Bats SAC
- The Salisbury Plain SPA.

7.11 the HRA considered each policy of the NDP in turn and found that, provided that certain recommendations were incorporated into the NDP, it was possible to conclude, beyond reasonable scientific doubt, that there would be no adverse effects on the Bath and Bradford on Avon Bats SAC, alone or in- combination with other plans and projects of all of the policies. These recommendations consisted of changes to wording in some of the policies.

7.12 The local community values biodiversity highly and impacts on nature have been a concern throughout the plan process. The Steering Group was therefore pleased to incorporate all of the suggested changes put forward by the HRA. The NDP was modified to this effect prior to Regulation 14 consultation.

8.2 Response forms were devised (see right) and these were available online and from the Parish Council. Copies were delivered to each house.

North Bradley Neighbourhood Plan

Public Consultation

Formal plan consultation required by Regulation 14 of the Neighbourhood Planning Regulations 2012



Pre-Submission Consultation Feedback Form

This form is for responses to the draft North Bradley Parish Neighbourhood Development Plan as part of the Regulation 14 pre-submission consultation process ending on **3rd March 2019**.

The draft Plan, the accompanying Scoping Report and copies of this form can be viewed or downloaded at <http://www.northbradley.org.uk> or are available to view in hard copy at various locations, including the North Bradley Primary School, Trowbridge Library and Peace Memorial Hall. Also by appointment at North Bradley Baptist Church, and the home of Councillor Lee.

This Form has two parts: **Part A** – Personal details – only need to complete once
Part B – Your representations – **securely attach** as many sheets as required

All responses will be published in the Consultation Statement that will accompany the final Plan.

PART A: Personal details: (if an agent is appointed please complete their details as well)

	Personal details	Agent details (if applicable)
Title and Surname		
First Name		
Job Title / Organisation (Where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Post Code		

Information on how to return the feedback forms are detailed at the bottom of Part B overleaf
All responses and personal details will be published online by Wiltshire Council and original hard copies kept by North Bradley Parish Council in accordance with current data legislation

8.3 Flyers (below) were also produced and distributed to every household:



LANDSCAPE & VISUAL SETTING ANALYSIS
PROPOSED LANDSCAPE GAP: NORTH BRADLEY TOWNSHIP

North Bradley Parish Neighbourhood Plan - The Essentials

The information on this page does not form part of the plan itself, but is produced to assist in the publicising of the plan this consultation purpose. It is written principally for our residents, but it is anticipated that it will be useful to others interested in the plan.

North Bradley Parish Council began working on your Neighbourhood Plan around three years ago. The plan gives parishioners direct power to deliver their vision of the change they want to see. A key issue has been keeping North Bradley separate from Trowbridge, which the Plan will help to do.

It is important to highlight the fact that the Parish will also be seriously affected by Wiltshire Council's proposals for housing areas in their Wiltshire Housing Site Allocations Plan (WHSAP), far more so than our Neighbourhood Plan. The WHSAP proposals have caused some difficulty in devising the Neighbourhood Plan, particularly in safeguarding the landscape gap between the Parish and Trowbridge. In the plan inside this leaflet you will see the proposed Landscape Gap, the areas proposed by the Parish Council for housing and the areas of housing proposed by the WHSAP.

The Policies

Policy 1 - The North Bradley Landscape Protection Area - This is proposed to maintain a separate identity for North Bradley village. No significant development is proposed on the land between Boundary Walk and the village, on Trowbridge Football Club site and on the land next to White Horse Business Park. This will also help to maintain a wildlife corridor from Southwick Country Park to the Bliss Wood area.

Policy 2 - Housing Policies - There will be no further large scale development within the parish after the WHSAP proposals are established. Some modest developments are included in the Neighbourhood plan and the building of affordable homes (possibly self build), Eco-homes and retirement properties (possibly sheltered accommodation) will be encouraged.

Policy 3 - Proposed Homes - Within the Neighbourhood Plan, around 60 homes are proposed on Park Farm (35 no) and off Woodmarsh to the east of the Progressive Hall (25 no). These sites will have to take account of the Wiltshire Council Bat Mitigation Strategy that is expected to be produced early in 2019. Other sites were considered, but because of serious planning objections, they have not been pursued.

Policy 4 - Local Green Spaces - The Peace Memorial Playing Field, Pine Walk/Oak Drive Recreation area, the allotments and Trowbridge Town football ground will be protected from development.

Policy 5 - Bat Conservation policy - All development applications will have to be accompanied by an Ecological Report.

Policy 6 - Developer Contributions - All new Housing and employment proposals in the Parish will be expected to contribute towards local infrastructure.

Policy 7 - Parish Burial Ground - The provision of a new non-denominational burial ground will be supported.

There should be very minor development over the remainder of the Parish through the Neighbourhood Plan.

Thank you for reading this leaflet and I hope that you are convinced that we would welcome your views. I look forward to meeting some of you at the consultation events.

Leo Lee
Steering Group Chairman

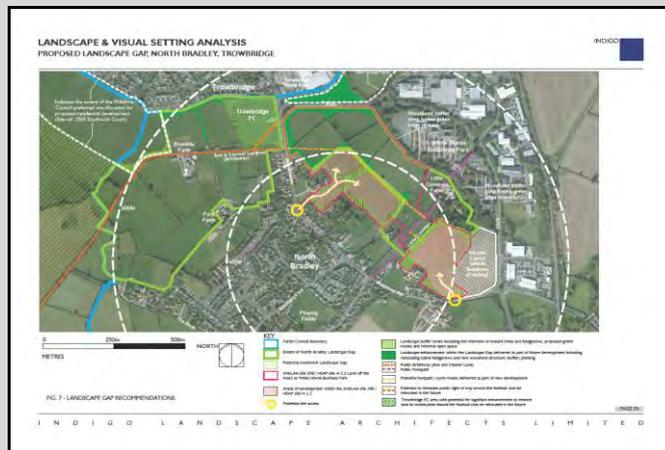
8.4 Response forms and copies of plan documents were available at drop-in events held at the Baptist Church on:

Friday 8th Feb (4-7pm)
Saturday 9th Feb (10.00-12.00 and 2-4.30pm)

8.5 The Wiltshire Times was invited, and an article appeared in the paper – see right.

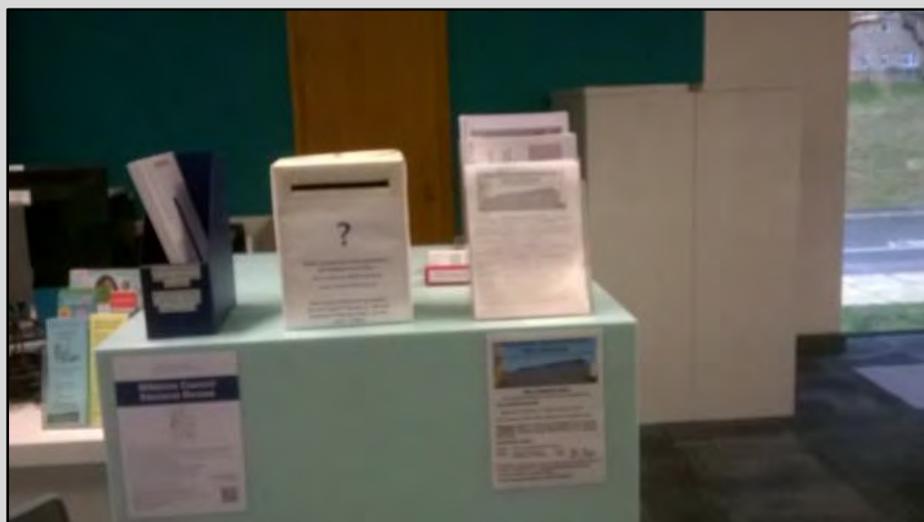


8.6 A map was produced showing the proposed sites, the landscape gap proposed by the plan and the sites of the Wiltshire HSAP. This was displayed as a talking point at the events. The map unfortunately contained an error in that it appears to show the proposed North Bradley Landscape Gap eating into HSAP site H2.2 (SHELAA 298) instead of running around its outer boundary (map below). **A comprehensive Policy Map was produced after Regulation 14 with this error corrected.**



- 8.7 The consultation period lasted seven weeks **between 21 January and 10 March 2019**. An electronic survey mirroring the two-page questionnaire was on line via the Parish Council website for people to complete. There were 23 responses. All the NP documents were on the front page of the website.
- 8.8 Post boxes to accept questionnaire responses along with blank questionnaires and key NP documents were sited at the following venues: Trowbridge library, North Bradley Baptist church, North Bradley Primary School, North Bradley Peace Memorial Hall and the home of a member of the steering group.
- 8.9 The consultation was also available via Survey Monkey online.
- <https://www.surveymonkey.co.uk/r/HYTP3N5>
- 8.10 The statutory consultees were consulted directly via email as were the following amongst others:
- Owners of all adopted sites
 - Owners of rejected sites
 - Businesses
 - Local Churches
 - Primary school.
- 8.11 Three engagement open events were held at North Bradley Baptist Church on Friday 8th February 4-7 pm and Saturday 9th February 10am to 12 noon and 2-4.30 pm. Steering group members were on hand to answer any queries and visitors had the opportunity to post their comments into a post box. Approximately 160 people attended over the three sessions. There were altogether 148 responses posted in the comments post boxes.

Response Boxes and explanatory material were left in prominent locations such as the local library.



8.12 Following the Consultation period, the following responses were received.

Responses from Statutory Consultees

Respondent	Date	Summary of Comments	Plan Response
Woodland Trust	03.03.19	<p>3rd March 2019</p> <p>Neighbourhood planning is an important mechanism for also embedding trees into local communities, as such we are very supportive of some of the policies set out in your plan.</p> <p><u>Vision and Objectives</u></p> <p>Amend Objective 6 to include: Protection of Local Green Spaces of community value, such as any ancient and veteran trees.</p> <p><u>Local Green Space</u></p> <p>Amend Policy 4 with the following sentence:</p> <p><i>'There should be no harm to or loss of irreplaceable habitats such as ancient trees and veteran trees'</i></p> <p>Identify importance of ancient woodland. Establish buffering: for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland.</p> <p>Require, each new house to provide a new street tree.</p> <p>Protect Local Services and Community Facilities.</p> <p>Retain and enhance recreational and local green spaces and resist the loss of open space. Establish standards in development.</p> <p>Note role of Trees in managing climate change.</p>	<p>Noted.</p> <p>Will amend to reflect this issue</p> <p>The Policy concerns the designation of legally-defined 'Local Green Spaces', rather than protection of biodiversity per se.</p> <p>Importance of ancient woodland will be emphasised. (e.g. in Objectives)</p> <p>This may be over-prescriptive especially given layout constraints of 54 Woodmarsh and the need to create a good design.</p> <p>This is already an objective of the NDP. Standards already exists – e.g. in the WCS.</p> <p>Will note in Section 5.</p>

Respondent	Date	Summary of Comments	Plan Response
Environment Agency	01.03.19	<p>Thank you for consulting the Environment Agency on the North Bradley Neighbourhood Plan.</p> <p>We note that our previous comments have been built into the document.</p> <p>Therefore, we have no further comments to offer. Kind regards, Planning Advisor– Wessex Sustainable Places – Environment Agency</p>	Noted.
Natural England	25.01.19	<p>Development at Park Farm may degrade the recreational quality of the area. It may be argued that this development would be contrary to NPPF para 97 (relating to loss of open space) and Wiltshire Core Strategy green infrastructure policy (CP52 - Retain and enhance existing on-site green infrastructure). We suggest that the policy is amended to ensure that there is no net loss of open space value through either on or off-site measures. We will be advising Wiltshire Council directly with respect to Habitats Regulation Assessment matters. In other regards, we have no comments to make.</p>	<p>Park Farm is not public Open Space within the meaning of NPPF para. 97. It is private land.</p> <p>It has been decided to withdraw the site due to lack of community support.</p>
Historic England	05.03.19	<p>Thank you for your Regulation 14 consultation on the Pre-Submission version of the North Bradley Neighbourhood Plan.</p> <p>The focus of our attention is Policy 3. Park Farm and 54 Woodmarsh are likely to be acceptable site allocations in principle. But housing numbers aspired would require appropriate site layout and design. We are happy to defer to Wiltshire Council in detailed assessment of site allocations criteria. Otherwise, are no further comments other than to congratulate your community on its progress and wish it well in the making of its Plan.</p>	<p>We are aware of the need to achieve good design and avoid harmful impacts on heritage assets and this is reflected in policy.</p>

Respondent	Date	Summary of Comments	Plan Response
Southwick Parish Council	N/A	No Reply	N/A
West Ashton Parish Council	N/A	No reply	N/A
Heywood Parish Council	N/A	No reply	N/A
Trowbridge Town Council	N/A	No reply	N/A
Westbury Town Council	N/A	No reply	N/A
WILTSHIRE COUNCIL	N/A	No reply	N/A
St Nicholas C of E	N/A	No reply	N/A
North Bradley Baptist Church	N/A	No reply	N/A
Yarnbrook Baptist Chapel	N/A	No reply	N/A
Secretary, Friends of Church of All Saints, Brokerswood	N/A	No reply	N/A
North Bradley C of E Primary School	N/A	No reply	N/A
Trowbridge Football Club	N/A	No reply	N/A

8.13 Response from Wiltshire Council

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council	13/03/19	Amend NDP to refer to NPPF February 2019	Agree. This version of the NPPF was published after the consultation preparations commenced.
		Amend NDP to refer to draft Trowbridge Bat Mitigation Strategy Feb 2019.	Agree.
		The NDP has been prepared positively with a proactive attitude to achieving the desired outcomes of the parish, and at the same time helping to address issues identified in the WCS Trowbridge Community Area Strategy (Core Policy 29). It is considered that care has been taken to understand how the draft NBNP can support the strategic development needs set out in the WCS and emerging WHSAP and plan positively to support local development.	Noted.
		Document is too long. Reduce appendices.	The appendices are included to reduce the need to cross reference, which may be more difficult for elderly readers. However, agree to look at reducing overall length as this is a worthwhile objective.
		Include a policy map to show the extent of policies and designations in one place. This map should include the extent of the 'Landscape Gap' (Policy 1), housing site allocations and Local Green Space, and also show clearly the settlement boundary for North Bradley that is proposed in the draft plan.	Agreed. Policy Map to be included.

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		Recommended changes from HRA have been incorporated.	Noted.
		Policy 1 constrains HSAP site H 2.2 and layout proposed would lead to erosion of wildlife corridor. There would also be negative heritage impacts. Policy 1 must be changed to concentrate development in north-east of site, not South-West. Review Landscape Setting and Visual Analysis	It is frustrating to be told this at this stage since the proposed site layout (Option 1 of 3 considered at a meeting with Wiltshire Council officers in August 2018 is based on advice from the Council's own Ecologist! Nevertheless, the NDP will be amended to switch to Option 3 agreed with the County Ecologist as this located development in the North and East. This will also move development further away from North Bradley village.
		Alignment of Plan to 2026 and WCS is acceptable.	Noted. The plan will also be reviewed and can be updated in future.
		Amend paragraph 4.10 Re housing needs of Trowbridge. The most recent Housing Land Supply Statement ¹ in Appendix 6 shows an indicative remaining requirement for Trowbridge of 1,452 dwellings; the WHSAP is bringing forward six allocations at Trowbridge for approx. 1,050 homes.	Noted. Will amend text.
		Consider historic landscape character more fully.	This matter is considered adequately in the Landscape and Visual Analysis Report. This is considered to be satisfactory for the NDP's limited needs.
		Include data from HER. Acknowledge the potential for unknown heritage assets with archaeological interest to be present within a development site and field evaluation will likely be necessary prior to planning permission in order to inform of the significance of heritage assets impacted by the proposals (in line with the NPPF).	The plan already does include HER data *(such as the Heritage Map in the appendices). However, amend to make this clear. Will acknowledge archaeology as suggested. Amend Policy 3.

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		Paragraph 5.37 states that there are currently around 180 pupils at the primary school. Comments from Wiltshire Council education team state that there are currently 204 pupils at the school, and it is therefore very nearly full as the total capacity of the school is 210 pupils. It is suggested that where the draft NBNP refers to contributions from developers for infrastructure, school places are not mentioned.	Presumably what is meant by this comment is that School Places SHOULD be mentioned in the Developer Contributions Policy. Agree to amend to include this. Will also amend text regarding numbers.
		There should be more emphasis on improving air quality, encouraging development of brownfield sites over greenfield, noise control and alternative energy sources for heating.	These are matters already dealt with in higher level policy and in other legislative regimes. Renewable energy is already featured in policy 2. Agree to mention these issues where relevant.
		The latest draft of the NPPF now includes specific requirements for plug in vehicles and Ultra Low Emission Vehicle (ULEV) infrastructure and developers are being asked to provide ULEV infrastructure which can take the form of, for example, electric vehicle charging points. The draft plan provides an opportunity to promote this within the site allocations.	Agree. Will amend text accordingly.
		The draft plan possibly also provides an opportunity to redevelop former brownfield sites in preference to greenfield ones, depending if such sites are available and appropriate	There is very little brownfield land available in the Parish. The SSR looked at all known options available. The proposed recent redevelopment of the Pavilions is on brownfield land. This development will now be mentioned and supported in the NDP.
		Include policies on wood-burners	This matter is not strictly a land-use issue and is more appropriately dealt with under the relevant clean air legislation.

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		Regarding paragraphs 8.11, 8.12 and 8.13 of the draft NBNP, which provide details and maps of draft WHSAP allocations H2.1, H2.2 and H2.6 - please be aware that the Schedule of Proposed Changes document that was submitted alongside the WHSAP contains proposals for changes to some of these allocations, including changes to dwelling numbers, site areas, infrastructure requirements and site boundaries. It is recommended that these paragraphs are amended to reflect change references PC54 – PC62 and PC72 – 73 of the Schedule of Proposed Changes (July 2018) document. Proposed changes to site boundaries for H2.1 and H2.2 are set out in Annexes B and C respectively in that document.	As the HSAP is not yet adopted it seems more prudent to leave any re-labelling as suggested until the Regulation 16 stage of the NDP.
		Policy 1 states that 'no development will be permitted in the 'North Bradley Landscape Protection Area' shown on the policy map except in accordance with Wiltshire Core Strategy Policy.' It should be noted that there are various exception policies within the WCS that could potentially allow development within the 'gap', as set out in WCS paragraph 4.25. These include employment development and special needs housing etc. Policy 1 would not afford the same degree of protection as say an area designated as Local Green Space.	Noted. The area covered is not appropriate for designation as LGS as suggested because it forms a 'Large Tract of Land'. It is also privately owned and is not in general public use. It does not therefore conform to the criteria laid down in NPPF paragraph 100.
		Use single term to describe North Bradley Gap.	Agree. Will amend.

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		<p>Policy 2 This policy refers to development taking place 'within the settlement boundary throughout the plan area...' This is a little confusing as the only settlement with a settlement boundary is North Bradley. It is recommended that this is reworded to make it clear that the policy is supportive of small-scale housing and infill within the settlement boundary of North Bradley.</p>	Agreed. Will amend.
		Settlement boundary proposed is unclear. This should be included on comprehensive Policy Map	Agreed. Comprehensive Policy Map to be included.
		Policy 2. It is noted that new text (as recommended at para 5.23 of the HRA (December 2018) has been incorporated into the supporting text for this policy and therefore concluded that this policy will not lead to an adverse effect on the Bath and Bradford on Avon Bats SAC.	Noted.
		<p>The Drainage Authority, in their response to this consultation, have made specific comments regarding any new infill development. They state that 'when Warminster and Westbury Rural District Council's undertook the first-time sewerage for North Bradley and Southwick, they only provided a new foul sewer, leaving the storm water from individual properties going to the previous septic tanks. Thus, when infill development is proposed there is a need to determine when and how the existing properties surrounding the site drain the storm water in order to avoid possible flooding issues. The same applies for foul drainage as the individual systems connecting into the First Time Sewerage schemes may also have an impact on any infill development.'</p>	Agree to note at the relevant parts of the plan.

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		Policy 3 It is recommended that Policy 3 is contained within a defined policy 'box' like the other policies are, so it is clear to a decision-maker what Policy 3 is. It is also recommended that paragraph 8.36 which states 'the following sites are allocated' forms part of Policy 3, not as a separate paragraph.	Agreed. Will amend.
		It is noted that specific point (v) under the policy wording for Park Farm has been changed to that recommended in the HRA (December 2018). The same change has been made for the policy wording of 54 Woodmarsh. It is therefore concluded that this policy will not lead to an adverse effect on the Bath and Bradford on Avon Bats SAC.	Noted.
		The two sites allocated by this policy are referred to as 'SHELAA 322' and 'SHELAA 1040' and although the acronym SHELAA and what SHELAA sites are is explained in the Site Selection Report, some people reading the plan might not know what this means. It might be best to just call these two sites 'Site 322' and 'Site 1040'. Also, the glossary should be amended to give the correct definition of SHELAA i.e. economic land instead of employment land.	Site numbering as suggested may be even more confusing as this could relate to NDP numbering. Retain SHELAA reference as this is widely referred to in the plan documents. Amend erroneous definition in Glossary
		The two sites allocated by Policy 3 will also need to meet other requirements of the draft NBNP and WCS at the planning application stage and it may be useful to include this in the wording of the policy.	Since the sites will be covered by higher level policy, and since any developer could reasonably be expected to know that, it does not seem necessary to note it here.
		The reference to 'indicative' numbers of dwellings for each site could allow a greater degree of flexibility on what these sites will deliver than is intended. It is considered more appropriate to instead refer to 'approximate number of dwellings.'	Agree. Amend Text.

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		<p>Policy 2 This policy refers to development taking place 'within the settlement boundary throughout the plan area...' This is a little confusing as the only settlement with a settlement boundary is North Bradley. It is recommended that this is re-worded to make it clear that the policy is supportive of small-scale housing and infill within the settlement boundary of North Bradley.</p>	
		Settlement boundary proposed is unclear. This should be included on comprehensive Policy Map	Agree. Comprehensive Map will be provided.
		Policy 2. It is noted that new text (as recommended at para 5.23 of the HRA (December 2018) has been incorporated into the supporting text for this policy and therefore concluded that this policy will not lead to an adverse effect on the Bath and Bradford on Avon Bats SAC.	Noted.
		<p>The Drainage Authority, in their response to this consultation, have made specific comments regarding any new infill development. They state that 'when Warminster and Westbury Rural District Council's undertook the first-time sewerage for North Bradley and Southwick, they only provided a new foul sewer, leaving the storm water from individual properties going to the previous septic tanks. Thus, when infill development is proposed there is a need to determine when and how the existing properties surrounding the site drain the storm water in order to avoid possible flooding issues. The same applies for foul drainage as the individual systems connecting into the First Time Sewerage schemes may also have an impact on any infill development.'</p>	Agree. Amend text.

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		The Policy regarding Park Farm, SHELAA 322 states that access is not acceptable from Oak Drive, but it doesn't actually state where access should be provided from. There must be access to the site for it to be deliverable and the policy should specify this. Access from Woodmarsh would appear to be via a single lane road that possibly cannot be widened, so access may need to be taken from Orchard Way. The policy should specify the access location.	Site deleted.
		54 Woodmarsh SHELAA 1040, the policy does not specify where access to the site should be from, only that access design is to be agreed. The policy should specify the access location.	Agree to amend.

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		<p>The Drainage Authority request the following factors are considered:</p> <p>Foul drainage</p> <ul style="list-style-type: none"> • Since North Bradley is a sewerred area any proposed development must discharge to the public foul sewer network • Flow rates to the sewer from the development to be agreed with the sewerage undertaker • Should improvements be required to the existing sewer network to allow the site to be served then the development programme must allow sufficient time for the sewerage undertaker to appraise, design, fund and undertake the capacity improvements to ensure no increase in flood risk <p>Storm water drainage disposal</p> <ul style="list-style-type: none"> • All development planning applications will need to have a FRA/drainage strategy to conform to National and local requirements and policies • Storm water drainage disposal will need to follow the national hierarchy • For greenfield sites there will be no increase in peak flow rate from the site, in fact it is likely that discharge rates will not be allowed to exceed Qbar for greenfield flow rate, and may require peak flow to be reduced by 20% • Development will need to assess the impact of flow rates from site • Any storage and discharge rates will need to be agreed with the LLFA • The development may need to acquire third party ownership and riparian owners' permission to reach a suitable discharge point – no automatic right to cross third party land or discharge to watercourse not in ownership of the applicant • There is no automatic right to connect to highway drains. 	<p>These are matters for the planning application stage when the Drainage Authority will automatically be consulted. They are considered to be far too detailed for a, NDP. However, the issue of Drainage will feature in amended text.</p>

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		Policy 4 Have a comprehensive Policies Map	Agreed. A comprehensive Map will be provided.
		Policy 4 refers to 'paragraphs 76, 77 and 78 and the NPPF' – it is suggested that this should read 'of the NPPF' and also NPPF references throughout the draft plan should be checked to ensure they are consistent with paragraph numbers in the revised NPPF February 2019.	Policy 4 does not so refer. NPPF References have been checked and updated.
		Policy 5 and its supporting text includes the text recommended in the HRA Report (December 2018) and no further changes are considered necessary to this wording. It is therefore concluded that this policy will not lead to an adverse effect on the Bath and Bradford on Avon Bats SAC.	Noted.
		Para 8.52 refers to 'Policy 4' and this should be amended to refer to Policy 5. Also, it is suggested that the policy number and name should appear in the policy 'box' as a title, like other policies in the draft plan, to make clear that this is a policy.	Noted. Will amend accordingly.
		Policy 7 This policy could be amended to make clear that the provision of a new burial ground should not only meet relevant legislation but also comply with other policies of the neighbourhood plan and WCS.	It is not considered necessary to state this as it simply repeats other legislative requirements and will not affect their enforcement.

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		<p>Informal Community Actions Regarding the proposed informal action for the parish council to support the creation of a viewing platform at the Yarnbrook Balancing Ponds, the Drainage Authority, in their response to this consultation, have commented that 'balancing ponds are primarily a flood defence asset and can encourage biodiversity within an area and this will need consideration when maintenance of said asset/ponds is required.</p>	<p>This item has been removed from the plan.</p>
		<p>The parish does not have a flood or emergency plan and do not participate in the Parish Emergency Assistance Scheme for either flooding or snow.</p> <ul style="list-style-type: none"> • The parish does not have an emergency contact name with whom the weather team/duty officers could speak to in respect of a weather emergency. If this is something the parish would like to arrange please contact renate.malton@wiltshire.gov.uk who deals with these matters within the council. • Although the parish is close to Trowbridge, they may wish to consider drawing up an emergency plan. • Having a plan could enable the parish to improve its resilience in the event of extreme weather or other emergency event. It may also enable them to apply for funding to improve the village hall's resilience as the main focus of the community. Again, assistance with this can be provided via the above email contact. • Having a plan can assist with any community led planning applications. 	<p>Noted. Will include in informal community actions.</p>

Respondent Type	Date	Summary of Comments	Plan Response
LPA Wiltshire Council		Sustainable Transport Quantifying the traffic volumes / congestion would provide more robust data than the subjective description used.	This section is for informal community actions only and is not formal planning policy. It reflects comments made during consultation and as such is adequate for purpose. However, it is acknowledged that the acquisition of hard data could be useful.
		para 5.28 wants truly sustainable development – enlarging the school just draws in pupils from Trowbridge. Not necessarily sustainable. NP at 8.11 refers to new primary school on the Elm Grove development which has now been dropped, placing more pressure on this school to increase in size, potentially undermining the worthy sustainability aspirations of NP.	The aim of the plan is to balance development and facilities. This is a matter for Wiltshire Council.
		5.42 image is this related in any way to the NP? Seems out of context to me.	The purpose of the image is clearly explained. It is not out of context within the aim of the NDP to improve sustainable transport.
		• 6.6-point 3 bullet 1 – I think they mean reduce the number of speeding vehicles.	No. This is not the intention. The meaning is clear enough.
		• 6.6-point 3 bullet 2 – Not specific enough. WC has adopted parking standards.	This is considered to be specific enough for a General Objective of the NDP.

8.14 Responses from Developers, Businesses and Organisations

Respondent Type	Date	Summary of Contents	Plan Response
Trowbridge Town Council	11/02/19	I will be putting a recommendation to the town council to support the principles included in your NP and as a result make a revised comment to the Inspector for the HSAP to support the allocations within SHELLA site 298/HSAP site H 2.2 but only to the same extent as the North Bradley Neighbourhood Plan Consultation Draft, thus retaining a strategic landscape buffer between the town and the village, with the suggested landscape enhancements.	Noted.
Developer / Owner Mr and Mrs Tanner / David Glasson Planning		Park Farm adjoins the built - up area and will enable the provision of a sustainable housing site enjoying a high level of accessibility to existing employment, services and public transport connections as well as via non-car modes by foot and cycle. The site is well related to the settlement pattern so represents an entirely logical extension to the village and offers potential for meeting local housing needs. The SEA confirms the site is a reasonable alternative for the location of growth in the NBNP area. There will not be any incursion to the recreation land off Oak Drive. Orchard Way is quite capable of accommodating the additional traffic generation from the site and beyond to Southwick Road. Highways reports have confirmed various workable access options and the landowner is already in advanced discussions around delivery of its preferred option.	Noted. Unfortunately, the level of community opposition means that including the site would risk the plan being defeated at Referendum. It has therefore been decided to withdraw the site from the NDP.

Respondent Type	Date	Summary of Contents	Plan Response
Linden Homes / Nicolas Pearson Associates Developer / Agent	01/03/19	<p>Representation concerning HSAP site H2.2 (SHELAA 298).</p> <p>Object to limit on development numbers to 175, which seems an arbitrary figure.</p> <p>The NDP cannot be predicated on the provision of 175 dwellings being delivered from allocation H2.2 as this may not be in conformity with the WHSAP once adopted.</p> <p>Development at H 2.2 should be orientated towards the North and East</p> <p>Various detailed comments concerning layout and landscape setting. Proposed alternative layout as shown in attached masterplan document.</p> <p>NDP refers to TBMS – but this not published at time of publication of NDP. NDP should not refer to unavailable evidence.</p>	<p>This figure was agreed with Wiltshire Council and allows for a larger landscape gap with North Bradley.</p> <p>The NDP can only work on policy as it is at present. Clearly this could change as the HSAP is at a more advanced stage than the NDP.</p> <p>Agree. Plan with be amended to reflect this.</p> <p>Noted.</p> <p>The draft Trowbridge Bat Mitigation Strategy was discussed prior to publication at a meeting with Wiltshire Council in summer 2018. It has since been published.</p>

Respondent Type	Date	Summary of Contents	Plan Response
<p>Developer / Agent Castlewood Property Ventures / David Turley</p>	<p>01/03/19</p>	<p>Comments regarding Site H2.2 and Policy 1</p> <p>The proposed 'North Bradley Landscape Gap', as shown on Policy Map 1, overlaps substantially with proposed allocation H2.2 in the submission WHSAP.</p> <p>Object to limit of site numbers to 175. This would not be achievable. Suggest 300.</p> <p>Disagree with proposed site layout. Development should be located closer to Trowbridge than North Bradley.</p> <p>Location close to North Bradley means that The NP has not been prepared in general conformity with the strategic policies contained in the Development Plan.</p> <p>Various detailed comments concerning layout and landscape setting. Proposed alternative layout as shown in attached masterplan.</p> <p>The NP is contrary to the Core Strategy 2015, which sets out the spatial strategy for the District. The NP attempts to put in place a set of constraint policies (namely through Policies 1 & 2) that appear to contradict the adopted and emerging Development Plan.</p> <p>The NDP would not deliver sustainable development because it does not support the strategic development needs identified by Wiltshire Council.</p>	<p>Yes, this is an error. A new comprehensive policy map is being prepared. All HSAP sites should of course be excluded from the proposed landscape gap / buffer.</p> <p>Development at the density suggested is unlikely to provide a sufficient landscape gap for North Bradley.</p> <p>Agree. Proposed site layout in Reg 14 Draft NDP reflected advice from Wiltshire Council ecologist. However, this has changed. Site layout will be amended.</p> <p>No. This does not follow. The originally-proposed site layout would not change the overall strategy of the HSAP. However, the site layout has been amended to that suggested.</p> <p>Noted. Site layout changed.</p> <p>No. The NDP is complimentary to the WCS and emerging HSAP as explained in the plan documents. Refer in particular to WCS Paragraph 5.150.</p> <p>Incorrect. The NDP does support the strategy of the WCS. It has also passed a SEA.</p>

Respondent Type	Date	Summary of Contents	Plan Response
<p>Developer / Agent Castlewood Property Ventures / David Turley</p>		<p>The NDP should not promote less development than the Local Plan.</p> <p>There is no evidence or assessment of how at least 175 dwellings (current WHSAP allocation) will be accommodated on identified developable areas adjacent to North Bradley.</p> <p>In summary, as currently worded the NP frustrates rather than contributes to sustainable development. The NP should be brought forward in a way which is consistent with national policy and the strategic policies of the adopted and emerging Development Plan and have a positive contribution towards achieving sustainable development.</p>	<p>The NDP promotes MORE development than the Local Plan – allocating new homes as well as large strategic allocations.</p> <p>The NDP does not allocate site H 2.2, it simply recognises it. The level of housing was arrived at by Wiltshire Council and the methodology is theirs. The NDP is following the Examination Draft of the HSAP in terms of these numbers.</p> <p>Clearly not true. The SEA confirms that the NDP is likely to deliver sustainable development as it includes a clear strategy, consistent with the Development Plan, for planned growth and environmental protection.</p>

Respondent Type	Date	Summary of Contents	Plan Response
Welbeck Strategic Land / Heynes Planning	01/03/19	<p>Propose development at Southwick Road (Organpool Farm). Application for 95 homes submitted. Should also be allocated in the NDP.</p> <p>The site is large enough to accommodate significant numbers of affordable housing.</p> <p>The plan is not in general conformity with the strategic policies of the development plan for Wiltshire Council, the Wiltshire Core Strategy</p> <p>The HSAP is at draft stage and relying on it is premature.</p> <p>As the identification of a strategic sites forms a fundamental part of the draft NP then reconsideration of the strategy in terms of how local needs are to be met is required.</p> <p>Second it is not acceptable for the draft NP to say that a site is acceptable/not acceptable subject to a change in the numbers proposed.</p> <p>Are the proposed infrastructure contributions referred to in the NDP lawful?</p>	<p>Given that an application has now been submitted it seems unnecessary for the site to be allocated in the NDP. It should also be noted that Wiltshire Council rejected this site for inclusion in the SHELAA and HSAP.</p> <p>Community engagement showed that significant housing would not gain support and a plan containing it could therefore be prone to fail at referendum.</p> <p>Disagree. The Plan takes forward the overall strategy of the WCS. This is explained in the SSR, NDP and in this Consultation Statement.</p> <p>No. As stated in PPG, the community is able to bring forward a NP while a Council-produced Local Plan is being prepared.</p> <p>No. The NDP recognises but does not allocate Strategic Sites. The methodology for the HSAP, including its underlying calculations, is a matter for Wiltshire Council.</p> <p>The change in numbers from 225 in the draft HSAP to 175 in the Examination draft was agreed with Wiltshire Council before their Cabinet meeting of 3rd July 2018) in order to ensure an adequate landscape gap for North Bradley. The methodology for this figure is theirs. The NDP reflects this.</p> <p>Yes. (See NPPF paragraph 34, Wiltshire Planning Obligations SPD, and Wiltshire Local Plan Viability Assessment)) No additional burden is imposed. The Developer Contributions policy simply sets out priorities.</p>

Respondent Type	Date	Summary of Contents	Plan Response
Welbeck Strategic Land / Heynes Planning	01/03/19	<p>Any site that comes forward must meet the objectives of the draft NP Draft Vision</p> <p>Detailed comments on SSR At paragraph 1.1 (it should be 1.4) it states that to be deliverable a site must be available and in that context be in single ownership. We do not understand the relevance of 'single ownership'</p> <p>At paragraph 2.28 it states that North Bradley has very limited facilities. This contradicts paragraph 5.33 of the draft NP where a number of facilities are described including a convenience store.</p> <p>Wiltshire Council cannot demonstrate a 5.25-year land supply.</p>	<p>The Vision is aspirational, and sites need only to be in general agreement with it.</p> <p>PPG advises that a site can be considered available for development when there is confidence that there are no legal or ownership problems. Nevertheless, it is accepted that multiple ownership sites can be considered available.</p> <p>There is no contradiction. The facilities quoted are not sufficient to prevent the need for car-borne journeys for everyday needs. They are basic for the population served.</p> <p>The Land Supply Statement published (March 2018) by Wiltshire Council contradicts this assertion.</p>

Respondent Type	Date	Summary of Contents	Plan Response
Welbeck Strategic Land / Heynes Planning	01/03/19	<p>The site selection process is flawed.</p> <p>Site capacity at Organpool Farm is cited at 120 Units. We have only ever proposed 95. Why was the site not considered for fewer numbers than 95?</p>	<p>The site selection process has evolved over more than a year and has gone through several stages, including matters not covered in the Site Selection Report, but included in the Consultation Statement and NDP. All these documents need to be read together.</p> <p>However, agree that this could be made more transparent and so an additional section of explanation will be added to the NDP.</p> <p>Community engagement on sites (March -April 2018) indicated a preferred number of new houses as being 11-50. The site at Park Farm was indicated to have a capacity of 119 in the SHELAA. However, as the site was being brought forward in the NDP and not by a developer, the Steering Group were able to substitute a much lower figure, at a level more likely to be acceptable to the community. It did not have this power with reference to Organpool Farm, nor did the developer ever offer to reduce the numbers below 95. The scale of Organ Pool farm was therefore a legitimate reason for rejection since the plan must be capable of passing a referendum. (q.v. Tattenhall Judgement).</p>

Respondent Type	Date	Summary of Contents	Plan Response
Welbeck Strategic Land / Heynes Planning	01/03/19	<p>Under 'Impact on Bats SAC?', Park Farm has been assessed as 'Yes, likely. Would be less from small scheme.', whereas Organpool Farm has been assessed as 'Yes. Large scale and not for local needs'. Again, this demonstrates an entirely inconsistent approach to the way in which these sites have been considered.</p> <p>In addition, both Park Farm and Woodmarsh are in close proximity to Listed Buildings and Non-Designated Heritage Assets, meaning that any development of these sites will need to take this into account. This is a constraint that is not present at Organpool Farm</p> <p>We note that at paragraphs 4.12 and 4.15 summaries are provided of Park Farm and our Clients site. It is noticeable that significant issues are raised in respect of both sites but that in relation to the Park Farm site suggestions are made as to how certain issues may be overcome but the same approach is not taken regarding the site at Organpool Farm.</p>	<p>No. At the time the TBMS was emerging and it was felt that either site could have impacts on Bats from the SAC (a subsequent HRA Screening ruled this out for Park Farm) Clearly the risk of such an impact is greater with a larger site. Impact on Bats was, however, not a critical factor in site selection. Park Farm has since been deleted as a site due to community opposition.</p> <p>This impact has been assessed and it is understood that it would require care in design. However, consultation with Historic England and the LPA's conservation officer have indicated that this would be possible. But, the objection is not relevant because site selection was not made primarily on the basis of impact on Heritage Assets. Park Farm has since been deleted as a site due to community opposition</p> <p>Other factors had already ruled Organpool Farm out of consideration. These were:</p> <p>The site had been rejected by Wiltshire Council during the SHELAA (unlike Park Farm).</p> <p>The proposed size of development at Organpool Farm was too large to be acceptable to the community. (unlike Park Farm which could be controlled by the NDP allocation process).</p> <p>Community opposition to Organpool Park Farm. See CS / NDP for details.</p> <p>Park Farm However was acceptable against these criteria and the more detailed issues relating to it could therefore be considered.</p>

Respondent Type	Date	Summary of Contents	Plan Response
Welbeck Strategic Land / Heynes Planning	01/03/19	<p>Various criticisms of site selection of NDP sites.</p> <p>What evidence is there to support the fact that access for Park Farm can be achieved if not through Oak Drive?</p> <p>Reference is made to the need for mitigation in respect of a non-listed (designated?) heritage asset. Again, has it been demonstrated that this can be achieved?</p> <p>What evidence is there that the site proposed at Woodmarsh is suitable?</p>	<p>Process has been consistent. However, agree to clarify.</p> <p>The site was assessed as suitable by the SHELAA. In addition, the owners have investigated this matter with a highway engineer, although detailed information has not been provided. Park Farm has since been deleted as a site due to community opposition</p> <p>Yes. Discussions with Historic England and the Conservation Officer (see CS) have indicated that this is possible. Park Farm has since been deleted as a site due to community opposition</p> <p>The site was assessed by Wiltshire Council as part of the SHELAA and found to be suitable. The SSR also records a Site Survey by the Steering Group.</p>

Respondent Type	Date	Summary of Contents	Plan Response
Welbeck Strategic Land / Heynes Planning	01/03/19	<p>Has the Steering Group received confirmation from the landowner that the delivery of 30% affordable housing is considered acceptable on each site? Viability is key in respect of delivery and this includes landowner expectations.</p> <p>Use of term 'preserved' rather than 'maintained' in Policy 1 regarding Landscape Gap. Should be 'Maintained' to be consistent with paragraph 5.150 of the Core Strategy.</p> <p>Have the two sites proposed been tested against the emerging TBMS?</p>	<p>Viability for the site is established through the SHELAA process and also through the Local Plan Viability Study (2014) published by Wiltshire Council. The level of affordable housing is set by WCS policy which has also been viability tested. There is no need to consider landowner expectations at this stage. The HNS shows that even at lower levels of delivery, it is very likely that sufficient affordable housing would be provided.</p> <p>Agree to amend. paragraphs 4.7 and 4.8 of the draft NP.</p> <p>Yes. Discussions have been ongoing with the County Ecologist since before the TBMS was published. A Meeting was held with officers from Wiltshire Council concerning sites and bats in August 2018. The Sites proposed passed HRA and SEA and the NDP also includes a specific Bat Protection Policy linked to the TBMS (Policy 5)</p>

Respondent Type	Date	Summary of Contents	Plan Response
Welbeck Strategic Land / Heynes Planning	01/03/19	<p>We object to the Draft Vision with reference to allocated sites in the HSAP as there is no certainty of delivery.</p> <p>We object to the term 'preserve' in the Draft Vision point 1;</p> <p>We object to the identification of sites in draft Policy 1 that are not contained in a formally adopted Plan</p> <p>We object to the term 'preserved' in draft Policy 1;</p> <p>We object to the inclusion of the two sites in draft Policy 3. They should be replaced by the site at Southwick Road;</p> <p>We object to draft Policy 5 in that it is premature in advance of the TBMS.</p>	<p>The NDP can only respond to the planning context that exists at the time it is made. The HSAP is likely to be adopted before the NDP and if there is any change the NDP would have to respond to that.</p> <p>Agree to amend to 'Maintain'.</p> <p>See answer above. The emerging HSAP is valid planning context for the NDP, which cannot ignore it.</p> <p>Agree to amend to 'Maintain'.</p> <p>Disagree. The site referred to was rejected as described in the SSR/ CS and NDP. It is necessary to read all three documents to understand the entire rationale behind site selection. Park Farm has since been deleted as a site due to community opposition</p> <p>No. The policy has been drafted together with the County Ecologist and is consistent with the merging TBMA.</p>

Respondent Type	Date	Summary of Contents	Plan Response
Welbeck Strategic Land / Heynes Planning	01/03/19	The NP does not achieve sustainable development.	<p>Disagree. The Plan aims to deliver housing and environmental protection in a coherent and balanced way. The SEA (October 2018) concluded (9.41):</p> <p><i>‘Overall the appraisal of the NBNP has not identified the potential for significant negative effects...’ It added (9.46);</i></p> <p><i>‘Overall it is considered that the NBNP takes a proactive approach to delivering new development whilst protecting key aspects of the natural and built environment that contribute to the overall quality of place and living in this area. The NBNP seeks to proactively address the cumulative effects arising from implementation of the HSAP alongside the NBNP and seeks to reduce the potential for negative effects in this respect, whilst maximising the potential for positive effects arising’.</i></p> <p><i>‘In particular the positive impact of the NDP on housing, community health and wellbeing, transport, landscape and, with amendment, biodiversity were clear’.</i></p>

Respondent Type	Date	Summary of Contents	Plan Response
Shane Marshall	N/A	No response	N/A
johnny@sulis	N/A	No response	N/A
Felicity Tozer @ Savills	N/A	No response	N/A
Andrew Bowles (Landowner)	N/A	No response	N/A
B Walden (Landowner)	N/A	No response	N/A
M Brown (Landowner)	N/A	No response	N/A
H Clarkson (Landowner)	N/A	No response	N/A
B Nokes (Landowner)	N/A	No response	N/A
White Horse Business Park	N/A	No response	N/A
Caroline Hunt, Administrative Director	N/A	No response	N/A
Mark Greenfield @ Renrod (Undeliverable)	N/A	No response	N/A
juliatunnell@lfbbeauty.com	N/A	No response	N/A
marc@rogerlewis.co.uk	N/A	No response	N/A
lexy@summitchairs.co.uk	N/A	No response	N/A

Respondent Type	Date	Summary of Contents	Plan Response
mail@acheson&Acheson	N/A	No response	N/A
mailbox@haven-fire.co.uk	N/A	No response	N/A
info@dtr.vms.co.uk	N/A	No response	N/A
Wiltshire Friendly Society	N/A	No response	N/A
contactus@yivalis.co.uk	N/A	No response	N/A
Nutricia	N/A	No response	N/A
DQD Engineering	N/A	No response	N/A
West Wilts Gymnastics	N/A	No response	N/A
National Trust	N/A	No response	N/A
Thermis Ltd	N/A	No response	N/A
Plumbase	N/A	No response	N/A
Hitachi	N/A	No response	N/A
Platinum Motor Group	N/A	No response	N/A
Alfords Technologies	N/A	No response	N/A

8.15 Comments Received from Private individuals

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	1	2/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access to site and loss of green space.	Park Farm has since been deleted as a site in response to community opposition.
Private Individual	2	2/3/19	Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Drive.	Park Farm has since been deleted as a site in response to community opposition.
Private Individual	3	1/3/19	Objection to land adjacent to Park Farm as potential development, access, excess traffic along Orchard Way/Ash Drive. Also concerned over potential development of land off Woodmarsh Site 298.	Noted. See above two Plan Responses Site 298 is not proposed by the NDP but by Wiltshire Council. Comments regarding it should be addressed to them.
Private Individual	4	1/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Drive. Also concerned over potential development of land off Woodmarsh - Site 298	Noted. See above Plan Responses Site 298 is not proposed by the NDP but by Wiltshire Council. Comments regarding it should be addressed to them.
Private Individual	5	3/3/19	Support Plan in the main. Objection to land adjacent to Park Farm as potential development, access, excess traffic along Orchard Way/Ash Drive. Access, concern at possible loss of green area in Oak Drive.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	6	3/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Drive.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	7	1/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Drive. Detrimental to road safety, wildlife.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	8	3/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Drive, effect on environment and diversity of Malthouse Estate.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	9	3/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	10	3/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	11	4/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	12	2/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr. Also questioning why Park Farm was least popular site at previous consultation but has been included.	Scoring system was only one of criteria used. Please refer to Site Selection Report and NDP for more detail. Park Farm has since been deleted as a site in response to community opposition.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	13	1/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr. also destroy wildlife habitat	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	14	3/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	15	3/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	16	1/3/19	Support for Plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr. Safety access traffic.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	17	3/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr. Concern over effect on environment & wildlife. Wants to see use of Brown fill sites not green fields.	Noted. See above. Pavilions development recently announced is on brownfield land.
Private Individual	18	3/3/19	Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	19	2/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	20	2/3/10	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	21	3/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	22	24/2/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	23	3/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr. Wants to see use of brown fill sites before green fields.	Noted. See above. Pavilions development recently announced is on brownfield land.
Private Individual	24	2/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	25	28/2/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	26	2/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr change in the diversity of the Malthouse Estate if site developed. Use Brown fill sites not green fields	Noted. See above. Access would have to comply with accepted highway standards. Limited impact on biodiversity has to be balanced against housing need. Pavilions development recently announced is on brownfield land.
Private Individual	27	17/2/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development.	Noted. Park Farm has since been deleted as a site in response to community opposition.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	28	2/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr. Use Brown fill sites not green fields.	Noted. See above. Pavilions development recently announced is on brownfield land.
Private Individual	29	9/2/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	30	2/3/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr. Environmental issues, protection of North Bradley village identity. Refer to paperwork attached to questionnaire.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	31	12/2/19	Support for plan in the main. Objection to land adjacent to Park Farm as potential development. Access, excess traffic along Orchard Way/Ash Dr.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	32	9/2/19	Some support for plan. Objection over number of houses to be built, type of dwelling. Concern at loss of green area's and wildlife and there are no suggestions to mitigate green space and wildlife in plan.	Noted.
Private Individual	33	2/3/19	Objection to Park Farm – refer to documents attached to questionnaire Support 54 Woodmarsh.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	34	2/3/19	Object to Park Farm. Support for site 320 only. Objection – refer to documents attached to questionnaire.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	35	1 MAR 19	Full support for all NP and limited development at Woodmarsh	Noted.
Private Individual	36	9 FEB 19	Full support for the NP. Comments on Southwick Rd.	Noted.
Private Individual	37	7 FEB 19	No decision marked or written comment	N/A
Private Individual	38	9 FEB 19	Objection to 54 Woodmarsh	Noted.
Private Individual	39	9 FEB 19	Objection to 54 Woodmarsh	Noted.
Private Individual	40	2 FEB 19	Objection to Park Farm listing	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	41	3 FEB 19	Supporting NP in general but comments on road traffic from additional housing	The quantity of development proposed is modest and impacts would be small.
Private Individual	41	3 FEB 19	Supporting NP in general but comments on road traffic from additional housing	The quantity of development proposed is modest and impacts would be small.
Private Individual	42	7 FEB 19	Objecting to policy 3 and increased housing	Noted. Additional housing is needed for reasons stated in the NDP and SSR.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	43	9 FEB 19	Supporting NP in general esp. Scoping report sec. 1 – 2 and 4 - 7	Noted.
Private Individual	44	3 FEB 19	Supporting NP in general esp. Scoping report sec. 1 – 2 and 4 – 7 and need to retain village identity	Noted.
Private Individual	45	Undated	Supporting NP in general and the work of the PC	Noted.
Private Individual	46	9 FEB 19	Supporting NP in general and the work of the PC	Noted.
Private Individual	47	3 FEB 19	Supporting NP in general and the work of the PC	Noted.
Private Individual	48	9 FEB 19	Objecting and comments on access to Park Farm	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	49	9 FEB 19	Objecting NP in general and comments on school, traffic and pollution	Noted.
Private Individual	50	8 FEB 19	Supporting NP in general and the work of the PC	Noted.
Private Individual	51	9 FEB 19	Supporting NP in general and the work of the PC	Noted.
Private Individual	52	27 FEB 19	Supporting NP in general and the work of the PC with comments on preserving the village 'gap'.	Noted.
Private Individual	53	Undated	Objecting NP in general and comments affordable housing	Noted.
Private Individual	54	10 FEB 19	Supporting NP in all parts	Noted.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	56	8 FEB 19	No comments	N/A
Private Individual	57	8 FEB 19	Supporting in full	Noted.
Private Individual	58	Undated	Supporting NP in general and especially pol. Nos. 1 to 7	Noted.
Private Individual	59	10 FEB 19	Supporting NP in general and the work of the PC in preserving the village identity	Noted.
Private Individual	60	7 FEB 19	Supporting NP in general and the work of the PC with comments on preserving the village 'gap'.	Noted.
Private Individual	61	31 JAN 19	Commenting on NP and need to keep green fields and HSAP 8 -10	Noted.
Private Individual	62	9 FEB 19	Objecting with reference to school and traffic	Noted.
Private Individual	63	7 FEB 19	Supporting NP in full and all parts	Noted.
Private Individual	64	8 FEB 19	Supporting NP in full and all parts	Noted.
Private Individual	65	13 FEB 19	Supporting NP in full and all parts	Noted.
Private Individual	66	7 FEB 19	Supporting NP in full and all parts	Noted.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	67	25 FEB 19	Object to HSAP Site H 2.2 (SHELAA 298) Object to other sites on basis of environmental problems and traffic.	This is not a site proposed by the NDP. Objections should be raised with Wiltshire Council. Noted. However, it is necessary to balance environmental concerns with the need for more housing.
Private Individual	68	28 FEB 19	Objecting to housing, but not clear if this is to H 2.2 or 54 Woodmarsh.	Noted.
Private Individual	69	6 FEB 19	Supporting NP and commenting on site selection report P63	Noted.
Private Individual	70	28/02/20 19	Objecting to Policy 3. Southwick next. Protect our villages – Traffic Issues. Agree definite village strategies – including greenbelt – WC to commit to long term agreements	The NDP does aim to protect the village, provides strategy and does create a landscape buffer.
Private Individual	71	28/02/20 19	Objecting Policy 3. No developments off Woodmarsh and Westbury Road. Loss of village environment/identity. Major route for traffic.	Noted. It is unlikely that a modest development. Carefully designed at this location would compromise either the environment or village identity. Given the scale of the development, impact on overall traffic levels at this point are likely to be small.
Private Individual	72	26/02/20 19	Supporting all. Support draft plan as good representation of NB community wishes	Noted.
Private Individual	73	01/02/20 19	Commenting – Agree with NB plan, must invoke brown field policy. Concern about environmental pollution affected by new building plans	Noted. The Pavilions, announced recently, is a brownfield development. The WCS contains policies for sustainable construction.
Private Individual	74	28/02/20 19	Objecting Policy 3. Dangerous access on Westbury road. Loss of green landscape gap – linking to business park. Considerable traffic congestion and additional pollution, loud traffic noise, need traffic calming initiatives.	Access would have to comply with relevant standards. Impact likely to be modest due to limited scale and existing traffic levels.
Private Individual	75	28/02/20 19	Objection policy 3 – Development off Westbury road, dangerous access – effectively joining NB to Trowbridge. Why is all the development on this side of village? Traffic volumes and speed issues.	Access would have to comply with relevant standards. Impact likely to be modest due to limited scale and existing traffic levels. Keeping NB separate from Trowbridge will be enhanced by the NDP due to Policy 1.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	76	03/03/2019	Object Policy 3 Park Farm development / access / wildlife in fields Increase in children – school issues? Should use brown field i.e. Virgin Media bldg.	Noted, see above Plan responses. Brownfield is considered in the revised draft plan.
Private Individual	77	01/03/2019	Objecting Policy 3 No to more housing this side of NB. Consider other alternative i.e. Southwick side of NB Keep corridor between NB and Trowbridge	The NDP does create a buffer between Trowbridge and the village. Without the plan this will not exist.
Private Individual	78	14/02/2019	Objecting All. Strongly object to houses adjacent to the rank. See a need for housing but large development in rural areas not the answer. Big profits for developers building large numbers – should be kept to a minimum (e.g. 15 houses) to allow natural development of community	Noted. However, the NDP must present a balanced strategy involving protection of the environment and village identity (which it does) with necessary housing in order to deliver 'sustainable development' and pass Examination.
Private Individual	79	02/03/2019	Objecting Policy 3 No suitable access – scrap development of Park Farm. Wildlife disturbed. Flood risk from drainage on Orchard way.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	80	17/02/2019	Support as it does maintain the buffer zone around NB and Trowbridge	Noted.
Private Individual	81	01/03/2019	Objecting No housing off of Westbury Road. Access dangerous. Westbury Road already too busy. Consider other site on smaller scale	Noted, however access would have to comply with normal standards.
Private Individual	82	21/01/2019	Supporting It preserves character and guides future development as a separate larger village	Noted.
Private Individual	83	19/02/2019	Supporting Have some concern on size of development as it is approx. 1/3 size of existing village and bad access on Park Farm.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	84		Commenting – Road access awkward to Woodmarsh. Concern about Traffic problems. Plan makes best of a bad job.	Noted, however access would have to comply with normal standards.
Private Individual	85	23/01/2019	Supporting Important that NB remains a village separate from Trowbridge – No building at Woodmarsh	Noted. However, provision of necessary housing is a legitimate aim of the NDP.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	86	03/03/19	Commenting Para 5.3 Last sentence Southwick Rd/Bradley Rd/ Wynsome St runs SW from Westbury Rd and can be extremely busy Linking Southwick and NB on to A36. Support NDP Objectives 1 - 7	Noted, but the road cannot be described as 'extremely busy' by standards of all roads in Wiltshire. We have no data on specific traffic volumes to back such a statement.
Private Individual	87	26/02/19	Objecting Policies 1&2 Ignores Elm Grove Farm development. Sentiments in Policy 1 should apply to all parish esp. where land is a buffer between NB and Trowbridge. The plan should defend the integrity of whole parish including Drynham and Elm Grove	The NDP cannot block a Strategic Site as explained at length in the plan documents. If it attempted this, it could fail at Examination. This would then leave the village without the Landscape Buffer' provided by Policy 1.
Private Individual	88		Supporting with conditions New School, surgery and road system needed. Improve pavements throughout Include Leisure/Park areas. Parking improvement on business dev required.	Noted. Minor Text amendments.
Private Individual	89	28/02/19	Objecting Policy 3 Against more housing in NB needs to retain village identity. Concern Southwick is next and traffic too heavy. Build in other areas too much here already. Need traffic calming	Noted. However, provision of necessary housing is a legitimate aim of the NDP. Traffic calming is a matter for Wiltshire Council.
Private Individual	90	02/03/19	Supporting	Noted.
Private Individual	91	23/01/19	Alarmed with any development - keep as things are. Inevitable but it saddens me. New homes mean increased traffic congestion and parking issues.	Noted. However, provision of necessary housing is a legitimate aim of the NDP.
Private Individual	92	02/02/19	Supporting – Concern about increase in traffic. Suggest better idea to have a link direct from trading estate to A36. Too many houses included in plan	Noted. The NDP does not have the power to create the link proposed.
Private Individual	93	26/02/19	Supporting Traffic should be re-routed for access to A36	Routing of traffic is a matter for the Highway Authority.
Private Individual	94	22/02/19	Objecting – Ending up joined with Trowbridge (Less countryside)	The aim of the NDP is precisely the opposite – see for example Policy 1. Merging with Trowbridge is more likely without the plan than with it.
Private Individual	95	02/03/19	Supporting	Noted.
Private Individual	96	27/02/19	Supporting Happy to support plans outlined	Noted.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	97	28/02/19	Supporting Very good compromise which safeguards village atmosphere and allows for expansion in acceptable way	Noted.
Private Individual	98	28/02/19	Supporting – Good plan which retains village character and provides much needed housing	Noted.
Private Individual	99	02/03/19	Supporting – no direct impact on me however increase traffic continues to be an issue and needs to be addressed	The plan does not have the power to control traffic levels in the village.
Private individual	100	6/3/20	Supporting but Objections to Land Adjacent to Park Farm and concern about loss of green areas, especially buffer zones at village boundary.	Noted. However, the plan does preserve a large buffer between the village and Trowbridge.
Private Individual	101	8 FEB 19	Supporting NP in full	Noted.
Private Individual	151	Survey monkey	Supports in principle but cannot support Wiltshire Plan. NB would lose its character. Don't have infrastructure.	Noted. However, the NDP cannot oppose the HSAP. Comments regarding this should be addressed to Wiltshire Council.
Private Individual	152	Survey monkey	Supports policy 1, Landscape & visual setting analysis, preservation of rural landscape. Keep wildlife corridors open. NP only way to push back against landowners and developers. Fully supports plan	Noted.
Private Individual	153	8/03/19	Very much supports NP, maintain space between villages and town. Extra housing will create more traffic. Need to take traffic away from centres of population. Plan needs to call for measures to address traffic increase. Call for bypass.	Noted. However, the plan does not have the power to control traffic or create a bypass. These are matters for the Highway Authority (Wiltshire Council).
Private Individual	154	Survey monkey	Object to Park Farm, difficulty in accessing via Orchard Way. Lack of infrastructure – schools, surgery. Supports Organpool Farm. Less impact on residents.	Noted. However, Organpool Farm is rejected for the reasons given in the SSR. Park Farm has since been deleted as a site in response to community opposition.
Private individual	155	Survey monkey	Object to Park Farm, increased traffic, access egress difficulty. Only one access route. Impact on wildlife. Organpool has better vehicular access.	Noted, however access is not the main issue why Organpool was rejected. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	156	Survey monkey	Supports policy 1 Landscape protection area.	Noted.
Private Individual	157	Survey monkey	Supports policy 2 Housing policies	Noted.
Private Individual	158	Survey monkey	Supports policy 3, does not support building on green field spaces but if an allocation is needed then supports NBPC proposals.	Noted. The Pavilions, recently announced, is on Brownfield land.
Private Individual	159	Survey monkey	Supports policy 4 local green spaces	Noted.
Private Individual	160	Survey monkey	Supports policy 5 Bat conservation	Noted.
Private individual	161	Survey monkey	Supports policy 6 – Developer contributions	Noted.
Private Individual	162	Survey monkey	Supports policy 7 – Parish Burial Ground	Noted.
Private individual	163	Survey monkey	Supports policy 1 Landscape protection area	Noted.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private Individual	164	Survey monkey	Supports policy 2 Housing policies	Noted
Private Individual	165	Survey monkey	Supports policy 3, does not support building on green field spaces but if an allocation is needed then supports NBPC proposals.	Noted. The Pavilions, recently announced, is on Brownfield land.
Private Individual	166	Survey monkey	Supports policy 4 Local green spaces	Noted
Private individual	167	Survey monkey	Supports 5 bat conservation policy	Noted
Private Individual	168	Survey monkey	Supports 6 Developer contributions	Noted
Private individual	169	Survey monkey	Supports policy 7 Parish Burial ground	Noted
Private individual	170	Survey monkey	Policy 3 Park Farm Objects Consultation draft page 32 states access via Oak Drive not possible, access via Orchard Road not feasible. Remove SHELAA 322 on grounds of absence of suitable means to access the site	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private individual	171	Survey monkey	Strongly supports maintaining of village environment, green spaces and bat conservancy. Strong misgivings about housing allocation at Park Farm. Mis-naming has caused ill feeling. No suitable access.	Noted.
Private Individual	172	Survey monkey	Objecting to Park Farm as access is very poor. Negative effect on bats. Development better east of Woodmarsh.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	173	Survey monkey	Objecting to Park Farm – drainage from Orchard Way already causes flooding at Pine Walk. Parking, noise, safety for children would be compromised. Character of village lost.	Park Farm has since been deleted as a site in response to community opposition.
Private individual	174	Email 03.03.19	Map difficult to read. Garden paddock part of access to land behind Little Common. Areas chosen biased towards affecting fewest voters.	Sites were impartially selected using evidence (refer to SSR). New policies map will be provided.
Private Individual	175	Email 02.03.19	Objecting to policy 3, Park Farm not enough access through Ash Drive or Orchard Way. Traffic concerns. Would harm village divide and reduce green field gap. Supports Elm Grove Farm, Southwick Ct, 54 Woodmarsh and Paddock Little Common.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private individual	176	Email 03.03.19	Objecting to NP 8.16 – Elm Grove Farm Risk to bats due to increased street lighting, traffic, people walking. QE11 remaining as recreation will not support new development. Abundance of wildlife at risk. Traffic egress on to busy road. Any additional traffic will exacerbate standstill at Woodmarsh roundabout and Bradley Road.	This is not a site proposed by the NDP but the HSAP. Please make all comments direct to Wiltshire Council.
Private Individual	177	Email 03.03.19	Objecting to Park Farm - Access difficulties, particularly emergency vehicles.	Noted. Park Farm has since been deleted as a site in response to community opposition.
Private Individual	178	Email 03.03.19	In agreement with all but Park Farm. Should follow brownfield site policy. Access difficulties, dangerous for children and older residents.	Noted. Park Farm has since been deleted as a site in response to community opposition. The Pavilions is a brownfield site.
Private individual	179	Email 03.03.19	In agreement with all but Park Farm. Should follow brownfield site policy. Access difficulties, dangerous for children and older residents.	Noted. Park Farm has since been deleted as a site in response to community opposition . The Pavilions is a brownfield site.
Private Individual	180	Email 03.03.19	In agreement with all but Park Farm. Should follow brownfield site policy. Access difficulties, dangerous for children and older residents.	Noted. Park Farm has since been deleted as a site in response to community opposition. The Pavilions is a brownfield site.
Private individual	181	Email 03.03.19	In agreement with all but Park Farm. Should follow brownfield site policy. Access difficulties, dangerous for children and older residents.	Noted. See above. The Pavilions is a brownfield site.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private individual	182	Email 03.03.19	Object to Elm Grove Farm – not even included on map; sacrificial lamb, not consulted, defend existing boundary of North Bradley. Have exceeded expected housing allocation. Poorly considered and thought through. Increased traffic from Elm Grove residents to NB primary school. Elm Grove supports biodiversity for great crested newts, toads, frogs, grass snakes, adders, badgers, foxes and owls. Public amenity for walkers, cyclists, horse riders. Ancient hedgerows here.	This site is not proposed in the NDP but by Wiltshire Council in the HSAP. Please make all comments directly to them.
Private individual	183	28.02.19	Object to Elm Grove. Sacrifices green buffer between Drynham Lane and Trowbridge. Development will have impact on Drynham Lane, no consultation of parish council with residents. NBNP should welcome more development in NB to negotiate provision of shops, better green spaces, village amenities and even section 106 agreement to support village led initiative like owning their own public house.	This site is not proposed in the NDP but by Wiltshire Council in the HSAP. Please make all comments directly to them.
Private Individual	184	28.02.19	Object to Elm Grove. Sacrifices green buffer between Drynham Lane and Trowbridge. Development will have impact on Drynham Lane, no consultation of parish council with residents. NBNP should welcome more development in NB to negotiate provision of shops, better green spaces, village amenities and even section 106 agreement to support village led initiative like owning their own public house.	This site is not proposed in the NDP but by Wiltshire Council in the HSAP. Please make all comments directly to them.
Private individual	185	28.02.19	Object to Elm Grove. Sacrifices green buffer between Drynham Lane and Trowbridge. Development will have impact on Drynham Lane, no consultation of parish council with residents. NBNP should welcome more development in NB to negotiate provision of shops, better green spaces, village amenities and even section 106 agreement to support village led initiative like owning their own public house.	This site is not proposed in the NDP but by Wiltshire Council in the HSAP. Please make all comments directly to them.
Private individual	186	28.02.19	Object to Elm Grove. Sacrifices green buffer between Drynham Lane and Trowbridge. Development will have impact on Drynham Lane, no consultation of parish council with residents. NBNP should welcome more development in NB to negotiate provision of shops, better green spaces, village amenities and even section 106 agreement to support village led initiative like owning their own public house.	This site is not proposed in the NDP but by Wiltshire Council in the HSAP. Please make all comments directly to them.
Private individual	187	28.02.19	Object to Elm Grove. Sacrifices green buffer between Drynham Lane and Trowbridge. Development will have impact on Drynham Lane, no consultation of parish council with residents. NBNP should welcome more development in NB to negotiate provision of shops, better green spaces, village amenities and even section 106 agreement to support village led initiative like owning their own public house.	This site is not proposed in the NDP but by Wiltshire Council in the HSAP. Please make all comments directly to them.

Respondent Type	Identifier	Date	Summary of Contents	Plan Response
Private individual	188	02.03.19 Completed by agent	Supports policy 3 SHELAA 322 Provision of sustainable housing site enjoying high level of accessibility to high level of employment, services and public transport connections. Well related to settlement pattern meeting local housing needs. No incursion to Oak Drive recreation area. Orchard Drive capable of accommodating additional traffic generation from site and beyond.	Noted. Park Farm has since been deleted from the Plan, due to community opposition and access concerns.
Private individual	189	14.02.19	Objecting to any development on land adjacent to The Rank.	Noted. Presumably this refers to Organ Pool Farm, which has been rejected as a site.
Private individual	190	13.02.19	Encourages parish council to ensure that outlying residences in Yarnbrook are included in any consultation. Asking for a plot on Hawkeridge Road to be considered in the future.	Noted. Further sites are welcome for consideration in a future plan review.
Private individual	191	25.02.19	Objects to HSAP H2.2 Infrastructure does not support 175 residential properties in field beyond Woodmarsh. Will cause traffic and environmental problems along with noise and air pollution and possible rise in anti-social behaviour. Route into Trowbridge is used to capacity. Unnecessary to build so many houses in village.	This site is not proposed in the NDP but by Wiltshire Council in the HSAP. Please make all comments directly to them.

9.0 Reg. 14 Consultation – Summary of Issues and Themes from Responses and Comments

9.0 Responses from the Statutory Consultees

Relatively few statutory consultees responded. Of these the Environment Agency had no comment to make, Natural England made comments regarding the site at Park Farm (subsequently dropped from the Plan), Historic England noted that careful design and layout would be required for all sites, and the Woodland Trust requested that the importance of ancient and veteran trees and ancient woodland be recognised in the Plan. Minor changes were made to the Plan text to fulfill the requirements of the latter two consultees.

9.1 Responses from the LPA Wiltshire Council

The LPA made a long and detailed response. This included the following:

'The NDP has been prepared positively with a proactive attitude to achieving the desired outcomes of the parish, and at the same time helping to address issues identified in the WCS Trowbridge Community Area Strategy (Core Policy 29). It is considered that care has been taken to understand how the draft NBNP can support the strategic development needs set out in the WCS and emerging WHSAP and plan positively to support local development.'

9.2 In addition to various minor changes made to improve clarity and deal with technical issues the most important of the LPA's comments included the following points. The Plan Response is given in blue.

- Include a policy map to show the extent of policies and designations in one place. This map should include the extent of the 'Landscape Gap' (Policy 1), housing site allocations and Local Green Space, and also show clearly the settlement boundary for North Bradley that is proposed in the draft plan.
A Policy Map has been included as suggested.
- Change Policy 1 to concentrate development in north and east of site, not south and west
This change is made as requested on the Policy Map and in the text.
- Acknowledge the potential for unknown heritage assets with archaeological interest to be present within development sites
Policy text amended.
- Promote Ultra Low Emission Vehicle (ULEV) infrastructure within the site allocations.
Added to Policy Text
- Note importance of drainage issues in the Plan
Added to plan text
- State location of accesses in any sites
Location stated
- Mention the possibility of creating flood and emergency plans in Community Actions.
Added to plan text.

9.3 **Second HRA Screening**

Following the end of the Regulation 14 process, in March 2019 the Steering Group received a second HRA from Wiltshire Council (version 2019 LK/V3/15.03.19) This is given in Appendix 7.

- 9.4 The second HRA concluded that due to the site layout no proposed in NDP Policy 1 for Strategic Site H 2.2, there was a risk of adverse effects on the SAC and therefore:

'The layout of the North Bradley Landscape Gap should be reconsidered in light of Wiltshire Council's proposals for allocation H2.2 Land off the A363 at White Horse Business Park and adjustments made to ensure that the policy does not give rise to adverse effects in-combination with the HSAP.'

- 9.5 The NDP was revised to reflect this advice as well as other comments on similar lines from the LPA and developers. Specifically, the site layout for H 2.2 was changed to move the developed area of the scheme to the North and East and the Landscape Gap was reduced to avoid taking in areas of the Strategic Sites,

9.6 **Responses from Developers and Organisations**

Four developers / site owners responded to the consultation. These were as follows. The response of the NDP is given in blue ink.

- 9.7 Mr. and Mrs. Tanner - Developer / Owner (Agent: David Glasson Planning)
Comments promoting site at Park Farm
Site withdrawn from NDP due to level of community opposition and concerns about access.

- 9.8 Linden Homes – Developer (Agent: Nicolas Pearson Associates)
Representation concerning HSAP site H2.2 (SHELAA 298). Main points:
Object to limit on development numbers to 175.
Figure was agreed with Wiltshire Council and the methodology is theirs.

Development at H 2.2 should be orientated towards the North and East
Agree. Change Policy. The layout shown reflected advice from the LPA which has since changed.

- 9.9 Castlewood Property Ventures - Developer (Agent: David Turley)
Comments regarding Site H2.2 and Policy 1. Main Points:
The proposed 'North Bradley Landscape Gap', as shown on Policy Map 1, overlaps substantially with proposed allocation H2.2 in the submission WHSAP.
Error. Change.

Object to limit of site numbers to 175. This would not be achievable. Suggest 300.
Figure was agreed with Wiltshire Council and the methodology is theirs.

Disagree with proposed site layout. Development should be located closer to Trowbridge than North Bradley.
Agree. Change Policy.

Various unsubstantiated assertions concerning the failings of the NDP; not in general conformity with the development plan. Does not deliver sustainable development.
These statements rebutted point for point (see Section 8).

The NDP promotes less development than the Local Plan.
No. The NDP promotes a site in addition to recognising the strategic sites of the WCS.

9.10 Welbeck Strategic Land - Developer (Agent: Heynes Planning)

A very long and repetitive argument for the rejected site at Organ Pool Farm and against the site at Park Farm. Points raised included:

The plan is not in general conformity with the strategic policies of the development plan for Wiltshire Council, the Wiltshire Core Strategy

The NDP clearly demonstrates that this is not the case.

The HSAP is at draft stage and relying on it is premature.

The HSAP is a legitimate part of the planning context and cannot be ignored. As it is at Examination it must carry weight.

The site selection is flawed and inconsistent

Incorrect. However, clarity of explanation needs to be improved and additional material has been added to the CS and NDP.

Wiltshire Council cannot demonstrate a 5.25-year land supply.

2018 Land Supply Statement disproves this. In any case, it does not undermine the NDP.

Site capacity at Organpool Farm is cited at 120 Units. We have only ever proposed 95. Why was the site not considered for fewer numbers than 95?

The site was considered for both 95 (the number suggested by the developer) and the theoretical maximum capacity at 30dph). No number smaller than 95 was ever suggested by the developer and this is too large to be acceptable to the community based on earlier community engagement.

Inconsistency regarding assessment between Organ Pool Farm and Park Farm regarding bats.

No. Both sites were indicated as having a likely impact on bats and this is recorded in the table. A larger site (as Organ Pool is) could however reasonably be expected to have a greater impact. In fact, the criteria of impact on bats was not a deciding factor in allocating sites. Neither site now features in the Plan.

We note that at paragraphs 4.12 and 4.15 summaries are provided of Park Farm and our Clients site. It is noticeable that significant issues are raised in respect of both sites but that in relation to the Park Farm site suggestions are made as to how certain issues may be overcome but the same approach is not taken regarding the site at Organpool Farm.

This is because Organ Pool Farm was ruled out, due to failure to be deemed suitable in the SHELAA, being opposed by the community and being too large in dwelling numbers.

What evidence is there to support the fact that access for Park Farm can be achieved if not through Oak Drive?

The site has been withdrawn.

Use of term 'preserved' rather than 'maintained' in Policy 1 regarding Landscape Gap. Should be 'Maintained' to be consistent with paragraph 5.150 of the Core Strategy.

Agree. Text changed.

The Plan does not deliver Sustainable Development.

This assertion is not substantiated and is contradicted by the verdict of the independent SEA carried out by the Planning Authority.

9.11 **Responses from the individuals in the community**

The overwhelming majority of responses broadly supported the NDP. For some, the support was unconditional – accepting the plan in its entirety. For others the support was qualified, generally supporting the Plan but unhappy with one or more aspects of it. By far the largest component of this latter category were people who supported the plan but objected to the site at Park Farm. The following totals of responses are interesting:

Supporting the NDP and all its policies / sites	33
Broadly supporting the NDP but Objecting to Park Farm	36
Objecting to Park Farm (all, including above 36)	50
Objecting to 54 Woodmarsh	5
Directly Supporting 54 Woodmarsh	3
Objecting to all new housing	15

9.12 The strength of opposition to Park Farm is considerable and cannot be ignored in a democratic process which must give the wishes of the community a key role in decision making. Strong opposition could place the NDP in jeopardy at Referendum should the site not be removed from the Plan.

9.13 There is however broad support for a limited quantity of new housing, including some limited direct support for the site at 54 Woodmarsh (SHELAA 1040).

9.14 Other concerns were similar to those of earlier community engagement and are answered in Section 8. e.g.:

- Traffic
- Local biodiversity / environment
- Use brownfield sites for development
- Loss of green spaces
- Create Greenbelt
- Need to retain village identity
- Flood risk issues associated with development
- Objections to HSAP sites

10.0 Regulation 14 Analysis and Conclusions

- 10.0 The consultation process has been long and comprehensive with a variety of methods used and with all sections of the community having multiple and meaningful opportunities to comment.
- 10.1 While overall there is clear support for the plan, community opinion has led to substantial changes, especially in terms of site allocation. In particular the proposed site at Park Farm has now been dropped as including it would be likely to lead to failure of the Plan at Referendum. Significant changes were made as a result of inputs from the LPA and County Ecologist.
- 10.2 This consultation statement provides a clear paper-trail showing how policies have evolved and changed in response to community inputs, indicating the transparent and democratic nature of the process followed.

11.00 Second SEA Screening and Third HRA Screening*

- 11.0 Following completion of a post-Regulation 14 draft plan, because this contained significant changes it was once more submitted for SEA and HRA. The relevant Screenings are given in Appendix 7.

*Second HRA is recorded in Section 9 under reg 14 Comments from LPA Wiltshire Council

Appendix 1 Leaflet – Invitation to first public meetings



NORTH BRADLEY PARISH

BROKERSWOOD, NORTH BRADLEY
AND YARNBROOK



**DO YOU CARE ABOUT
YOUR PARISH?
HAVE YOU HEARD
ABOUT
NEIGHBOUR-
HOOD PLANS?**



**YOUR PARISH COUNCIL WISH TO
PRODUCE A NEIGHBOURHOOD
PLAN WHICH WILL ALLOW
RESIDENTS MUCH GREATER
CONTROL OVER HOW WE MOVE
FORWARD.**

THE PARISH COUNCIL BELIEVE THAT DECISIONS LIKE THESE SHOULD BE MADE BY THE RESIDENTS OF THE PARISH. WHY NOT COME AND GIVE YOUR VIEWS ON HOW YOU WOULD IMPROVE THE VILLAGE AND MOVE FORWARD? .



Cllr Roger Evans	reeswacf@googlemail.com	01225 754486
Cllr Lee Lee	lee.lee@btinternet.com	01225 752710
Cllr Bernard Clarkson	clarkson.bernard@btopenworld.com	01225752231
Cllr Michael Holland		01225 762743
Cllr Jenny Joyce	jennyjoyce70@icloud.com	01225 767505
Cllr Tony Deacon	office.tdeaconltd@aol.co.uk	01225 769145
Cllr Viv Regler	vivregler@hotmail.co.uk	01225 763457
Cllr Nick Crangle	nickcrangle@gmail.com	01225 761740
Cllr Horace Prickett	horace.prickett@wiltshire.gov.uk	07888 997050
Cllr Mike Kettlety	mikekettlety@btinternet.com	01225 719879
Cllr Gina Lunt	gina.lunt@rentokil-initial.com	

Come along and hear about your Neighbourhood Plan and have your say. Consultation meetings will be held as follows.

PROGRESSIVE HALL
SATURDAY 25TH FEBRUARY 2017
11.00 till 1.00 & 4.00 till 5.30

PROGRESSIVE HALL
MONDAY 6TH MARCH 2017
(BEFORE PARISH COUNCIL MEETING)
5.30 till 7.00

DROP IN SESSIONS AT
YARBROOK CHAPEL
WEDNESDAY 1ST. 3.00 till 4.00

ST NICHOLAS CHURCH,
To be confirmed

THIS IS YOUR CHANCE TO INFLUENCE HOW YOUR PARISH WILL MOVE FORWARD. HOW WE CAN MEET LOCAL NEEDS, ENSURE IT KEEPS ITS CHARACTER AND ALLOW IT TO HAVE A SUSTAINABLE FUTURE.

YOUR PARISH NEEDS YOUR INPUT

Do you want this to happen to your village?

What do you think about this?

Do you want your say about these?

Ashton Park Extension - 2600+ new houses. Already in outline but likely to become part of Trowbridge.

White Horse Business Park to be transferred to Trowbridge. The only green fields between Woodmarsh and Trowbridge to be built on, advocated by Trowbridge town

Northern Relief Road to bring even more HGV's through the village

Conversion of Virgin Headquarters into flats with the loss of employment opportunities

More residential housing to be built on the business park leading to overcrowding at our primary school

What do you think about this?

If the council has a Neighbourhood Plan, developers have to pay the parish 25% of the Community Infrastructure Levy, without one, only 15%. This money boosts considerably the finances of the parish and enables us to do far more to improve facilities like the playgroup, village halls, the school, the common, footpaths, provide traffic calming and bring about many other improvements to your area.

Appendix 2: Initial Questionnaire Form

NORTH BRADLEY NEIGHBOURHOOD PLAN

Your parish council is preparing a neighbourhood plan and needs to know what you think of the village and its future. Please help by filling in this short questionnaire to tell us your thoughts.

- 1 Do you live in the parish of North Bradley? yes/no
- 2 Do you feel part of the village of North Bradley yes/no
- 3 Please tell us three things you like about the village
i).....
ii).....
iii).....
- 4 Please tell us three things you dislike about the village
i).....
ii).....
iii).....
- 5 Please tell us three things you would change in the village
i).....
ii).....
iii).....

Any other comments you would like to make?

Please attend any of our consultation meetings for more information and a louder say on your future. Details overleaf.

NORTH BRADLEY NEIGHBOURHOOD PLAN

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- 5 Please tell us three things you would change in the village
i).....
ii).....
iii).....

Any other comments you would like to make?

Please attend any of our consultation meetings for more information and a louder say on your future. Details overleaf.

Come along and hear about your Neighbourhood Plan and have your say. Consultation meetings will be held as follows:

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11.00 till 1.00 & 4.00 TILL 5.30*

*PROGRESSIVE HALL
MONDAY 6TH. MARCH 2107
(BEFORE PARISH COUNCIL MEETING)
5.30 till 7.00*

*DROP IN SESSIONS AT
YARNBOOK CHAPEL
WEDNESDAY 1ST. MARCH 3.00 till 4.00*

*NORTH BRADLEY BAPTIST CHURCH
TUESDAY 7TH. MARCH 1.30 till 2.30*

THIS IS YOUR CHANCE TO INFLUENCE HOW YOUR PARISH WILL MOVE FORWARD, HOW WE CAN MEET LOCAL NEEDS, ENSURE IT KEEPS ITS CHARACTER AND ALLOW IT TO HAVE A SUSTAINABLE FUTURE.

YOUR PARISH NEEDS YOUR INPUT.

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11.00 till 1.00 & 4.00 TILL 5.30*

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MONDAY 6TH. MARCH 2107
(BEFORE PARISH COUNCIL MEETING)
5.30 till 7.00*

*DROP IN SESSIONS AT
YARNBOOK CHAPEL
WEDNESDAY 1ST. MARCH 3.00 till 4.00*

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YOUR PARISH NEEDS YOUR INPUT.

Appendix 3: Interaction with Village School



NORTH BRADLEY PARISH COUNCIL
INCORPORATING
NORTH BRADLEY, BROKERSWOOD AND YARNBROOK

Ms Kelandie Ash
Headteacher
North Bradley Primary School
Church Lane
North Bradley
BA14 0TA

50 Newtown
Westbury
Wiltshire
BA13 3EF

10 April 2017

Dear Kelandie

The Parish Councillors want me to thank you for allowing them to visit your school to discuss the Neighbourhood Plan with the pupils. Horace and Lee were extremely impressed with the suggestions that the pupils gave and they made a very helpful contribution towards the forming of the consultation document. It may well be that the school's assistance would be appreciated in the future as the plan develops.

Yours sincerely

Karin Elder (Mrs) (Clerk to North Bradley Parish Council)
T: 01373 823907
e: parishcouncil@northbradley.org.uk
www.northbradley.org.uk



North Bradley C.E. Primary School, Church Lane, North Bradley, Trowbridge, BA14 0TA

Headteacher: Miss Kelandie Ash

Tel: 01225 753230 email: admin@northbradley.wilts.sch.uk

Dear Cllr. Lee

Thank you for your visit to discuss the proposed Neighbourhood Plan the Parish Council and working on. On behalf of North Bradley Primary School and the governors I am writing to support North Bradley Parish Council's case for a Neighbourhood Plan.

The school values the role it plays in engaging with and being part of the parish community. The parish and village is a unique family community, with the church, school, village hall and it's rural environment. The governors and school leadership team strongly believe the existing boundaries and environment provide the pupils with a special experience and are a benefit for the parish residents.

Yours

Mike Simmons
Chair of Governors

**NORTH BRADLEY PARISH
COUNCIL (INCORPORATING
BROKERSWOOD, NORTH
BRADLEY AND YARNBROOK)**



Neighbourhood Plan - Possible Sites for Homes -

Your Comments Wanted, bring this form to a

Consultation at North Bradley Baptist Church on

Friday 16 March 5.30 - 7.30 p.m and

Saturday 17 March 10.00 - 12.00 a.m & 2.30- 4.30 p.m

Or if you are not able to attend return the completed form to

12 Churchlands, North Bradley, BA14 0TD.

As part of the community's emerging Neighbourhood Plan, Regulations require us to consider the matter of housing in North Bradley. We cannot ignore the needs of an increasing and changing population. Many of you were kind enough to respond to the Housing Needs Survey and we *expect to receive an analysis back from Wiltshire Council shortly, which we will then be able to share with the community.* We have had to search carefully for where some homes could be built to the least detriment to the Parish and at the most appropriate sites for the potential occupiers.

Sites have to be considered against a number of criteria, including whether the community would support them or not. We have had to consider all the sites that so far have been considered by Wiltshire Council and one at Organ Pool Farm, which has just been proposed by a developer. **Nothing has yet been decided**, but a Site Selection Report has been produced with the assistance of our planning consultant who is advising the community. The report is online at:

<http://www.northbradley.org.uk/index.php/en/parish-council> and from the Parish Council
mail parishcouncil@northbradley.org.uk

e-

The report analyses the various sites proven to be available and recommends that our Neighbourhood Plan takes forward just one of them, delivering housing to meet local needs only as shown in the recent Housing Needs Survey. Although it is unlikely that any housing beyond the sites indicated on this form will need to be considered to meet local needs, anyone in the community is free to put forward alternative sites to those shown here, IF these are accompanied by a good quality map showing the site boundary in red and written confirmation from the landowner that the site is available for sale or development.

The purpose of this short questionnaire is to seek your views on housing in North Bradley that can be delivered through the Neighbourhood Plan and your comments on the various sites indicated. Your responses will be used to create a 'Regulation 14' consultation draft plan which will then go out to all the community for a further 6 - weeks consultation in the late Spring or early Summer

Nothing has yet been decided, but a Site Selection Report has been carried out. The report is online at: <http://www.northbradley.org.uk/index.php/en/parish-council>

and from the parish council parishcouncil@northbradley.org.uk

1. Housing Supply in North Bradley:

a. Do you think that more housing is needed to meet local needs - for example young people and others who cannot afford local prices?

Yes No

To meet the needs of the open market?

Yes No

2. If new housing is to be created within the parish, how much should be allowed between now and 2026? Please tick.

a. None

b. 1-10 homes

c. 11-50 homes

d. 51-200 homes

e. More than 200.

3. What type of housing is most needed? (please state)

3. Please score the sites out of 10, 10 being the one(s) you most approve of, and 1 being those you approve of the least.

See map on next page for their locations.

SHELAA No: 298 South / south-west of Trowbridge
(**HSAP Site H2.2** 'Land off A 363 off White Horse Business Park')

SHELAA No.: 322 Park Farm

SHELAA No.: 613 Land south / south-west of Trowbridge (**HSAP Site H2.1** 'Elm Grove Farm')

SHELAA No.: 672 Paddock at Little Common Lane

SHELAA No.: 1040 54 Woodmarsh

SHELAA No.: 3565 'Southwick Court'
(**HSAP site H2.6**) Land South of Trowbridge

N/A Organ Pool Farm, Southwick Road, North Bradley

NOTE: Our neighbourhood plan cannot block the '**HSAP**' sites and will NOT be allocating them - these will be taken forward through a separate process run by Wiltshire Council. However, we include them here in order to get your opinions. The sites in blue type above could be allocated by the neighbourhood plan or a future revision. Nevertheless, please score all sites.

4. Please add any comments you have on any of the sites including any conditions that should be applied if they are to be allocated.

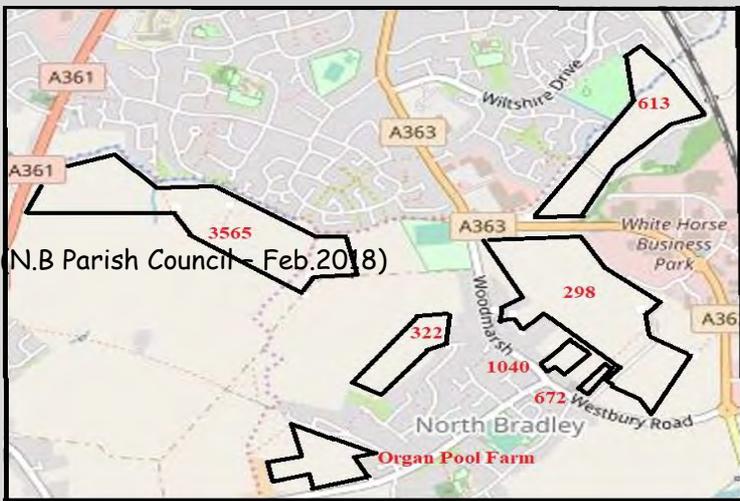
Please try to keep comments concise.

5. Do you have any other sites you would like considered?

NOTE: Only sites that are accompanied by an O/S based map drawn with a clear and accurate red site boundary AND written confirmation from the landowner that they are available for sale will be accepted.

6. Do you have any other comments on housing in North Bradley?

(Note: you will be consulted again during the formal 6-week 'Regulation 14' Consultation).



Obtained from Open Street

Appendix 4b: Advertisement for community Engagement on sites

PRESS NOTICE:

NORTH BRADLEY PARISH

COUNCIL (INCORPORATING BROKERSWOOD, NORTH BRADLEY AND YARNBROOK)

Neighbourhood Plan – Possible Sites for Homes –

Your comments are wanted at North Bradley Baptist Church on Friday 16 March 5.30 – 7.30 p.m and Saturday 17 March 10.00 – 12.00 a.m. & 2.30- 4.30 p.m.

As part of the community's emerging Neighbourhood Plan, Regulations require us to consider the matter of housing in North Bradley. We cannot ignore the needs of an increasing and changing population.

Nothing has yet been decided but a Site Selection Report is online along with a questionnaire about the sites identified at <http://www.northbradley.org.uk/index.php/en/parish-council> and from the Parish Council, email parishcouncil@northbradley.org.uk

If you are not able to attend, please return the completed form by 17 March 2018 to 12 Churchlands, North Bradley, BA14 0TD or by e-mail to parishcouncil@northbradley.org.uk

Appendix 4c: Example letter to interested parties regarding sites



NORTH BRADLEY PARISH COUNCIL

INCORPORATING

NORTH BRADLEY, BROKERWOOD AND YARNBROOK

8 March 2017

50 Newtown
Westbury
Wiltshire
BA13 3EF

Dear

SHLAA Site 298 Land off A363 off White Horse Business Park

We understand that you have an interest in above land that has been identified by Wiltshire Council as a potential site for housing.

As you may know, the community are currently preparing a neighbourhood plan. While it has not yet been decided to allocate any sites for housing in the plan, we have carried out some early research into various possibilities, including the site above. This has involved a Rural Housing Needs Survey (HNS) produced by Wiltshire Council on our behalf. Initial findings of all data including the HNS are contained within our Site Selection report (SSR).

A full 6-week consultation will take place according to Regulation 14 of the 2012 Neighbourhood Planning (General) Regulations later in the summer. However, we are asking for comments now on our SSR as an additional means of engaging the community including landowners and developers.

Please find enclosed therefore a copy of the Site Selection Report along with a questionnaire. It would be most helpful if you could give your comments either at one of the Community Engagement events on 16 and 17 March, details in questionnaire, or by email to the address below.

Comments must be received by 29 March in order to be sure of inclusion in the next stage of assessment.

Yours sincerely

Karin Elder

Karin Elder (Mrs)
T: 01373 823907

On behalf of North Bradley Steering Group for Neighbourhood Plan
e:parishcouncil@northbradley.org.uk
www.northbradley.org.uk

Appendix 4d: Letter Received from Agent Regarding Organpool Farm



Two Acres . Under Lane . Newmills . Launceston . Cornwall . PL15 8SN

T: 01566 700155 M: 07818 508319 E: ed@heynesplanning.co.uk

BY EMAIL ONLY:

North Bradley Parish Council
c/o Clerk to the Parish Council

Our Ref: HP0099

Date: 26th April 2018

Dear Sir/Madam

**Land at Organpool Farm, North Bradley
Proposed residential development by Welbeck Strategic Land II LLP**

We are writing to you following the Parish Council meeting held on 9th April 2018 at the Progressive Hall in North Bradley. As you know, our client Welbeck Strategic Land II LLP (WSL) are promoting land at Organpool Farm for future development. WSL were represented at the meeting by Ms Alice Brighton.

First of all, we wish to express our thanks to the Parish Council for inviting us to the meeting and giving us the opportunity to outline our proposals to both members of the Council and local residents who attended the meeting. This was the first opportunity for undertaking some local 'face to face' public engagement and hopefully everyone who attended the meeting found the exercise to be useful.

We wish to reiterate that proposals for the site are still at the preliminary stages and are evolving following technical work currently being undertaken by the project team. The purpose of the meeting was therefore to gain a greater understanding from both the local community and the Neighbourhood Plan group as to their aspirations for North Bradley and whether there is an opportunity for WSL and this site to contribute towards this. We also would like to emphasise that WSL plan to have further engagement in the future with the local community in respect of proposals for development of the land in question prior to the submission of any planning application. It is also our desire to liaise closely with the Parish Council during the preparation of the Neighbourhood Plan and provide assistance where considered appropriate in relation to any further consultation events.

Following the meeting Mr Tom Martin of Quattro (who are advising WSL) spoke with the Chairman of the Parish Council. The purpose of the discussion was firstly, to thank the Parish Council for allowing us to attend the meeting and secondly, to reiterate and confirm our Clients ongoing commitment to liaise with the Parish Council regarding its production of the Neighbourhood Plan and the potential opportunity for delivery of development on the site through that process.

At the meeting, WSL confirmed their initial thinking has been to bring forward plans for residential development of up to 100 units plus a relatively small amount of commercial development in the form of a local shop. As stated above, the proposals are evolving and they will be reviewed particularly in light of the progress being made with the Neighbourhood Plan. Consideration will also need to be given to delivery of the site through alternative means

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particularly noting the stage the Wiltshire Draft Site Allocations Development Plan Document has reached and, further, noting that Wiltshire Council is embarking on a review of its Core Strategy and consulting upon the Swindon and Wiltshire Joint Spatial Framework.

The delivery of a Neighbourhood Plan needs to follow the relevant procedures and guidance as set out in the relevant regulations. The Government sets out the role and status of such Plans in the National Planning Policy Framework (NPPF) and guidance is also provided in Planning Policy Guidance (PPG). We do not intend to set out all the relevant requirements/guidance as the Parish Council already has an advisor to assist with the production of the Plan.

WSL and its consultants have experience of dealing with the Neighbourhood Plan process. We are aware that the Parish Council has yet to draft its Neighbourhood Plan and that consultation (under Reg. 14) is not anticipated until the summer. However, the evidence base is already being collated (as stated earlier). A key element of this is the Site Selection Report (SSR). It deals with potential housing provision. We are also aware of the production of the Draft Scoping Report, February 2018.

As stated above, the SSR is a key document that deals with potential housing provision within the context of the Neighbourhood Plan. Following the meeting and having reviewed the document, we thought it would be helpful to provide some general comments and in particular, where reference is made to Organpool Farm.

Therefore, some key points are:

1. Reference to the Neighbourhood Plan – throughout the document (and the Scoping Report for that matter) various references appear as to how the document(s) has informed the production of the Neighbourhood Plan. However, it is written in such a way that the impression is given that the Neighbourhood Plan has already been drafted and that the SSR and Scoping Report is being completed retrospectively to justify the content of the Neighbourhood Plan and the decision-making process informing its production. That, we are sure, is not the intention but, in our view, this approach potentially could be damaging to the process of delivering the Plan and its credibility.

For example, at paragraph 2.7 on P.6 it states “*The full arguments are given in the NDP at Appendix 9*”. We have been unable to locate Appendix 9. It is an important document as it sets out the Parish Council’s views towards the strategy and content of Wiltshire Council’s draft Site Allocations DPD. There are other examples that we can provide if you so wish.

2. Reference to Wiltshire Council’s draft Site Allocations DPD - The earlier sections of the SSR examine the draft Site Allocations DPD and the role that Plan has in influencing the content of the Neighbourhood Plan. The observations made are noted but careful consideration needs to be given as to the relationship of that DPD with the production of the Neighbourhood Plan and, ultimately, the delivery of housing within North Bradley Parish. There are many assumptions made in the SSR regarding the objectives of the draft Site Allocations DPD and what it seeks to deliver and the evidence base supporting it. At this stage, there is no certainty as to what the draft Site Allocations DPD is going to deliver in and around North Bradley.

We note that support is being given to two sites in the draft Site Allocations DPD but if they are not delivered and alternative sites are brought forward, then how does that impact on delivery of development at North Bradley in terms of meeting future local needs. In that context, has consideration been given to delaying the production of the Neighbourhood Plan until the DPD is adopted? That would give greater

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certainty and clarity in terms of understanding what level of housing should be provided in terms of local housing needs being met.

One point that we would like some clarification upon is the source of the reference made in paragraph 2.5 whereby land outside of Trowbridge is needed in terms of meeting the town's needs? We do not object to this approach but it would be useful to understand exactly where and at what point Wiltshire Council made it clear that this was going to be a part of the overall strategy for delivery in and around Trowbridge.

3. Sustainability Appraisals – Has the Parish Council given consideration to this issue as part of the preparation of the Neighbourhood Plan? As set out in PPG, a qualifying body must demonstrate how its Plan will contribute to achieving sustainable development and a sustainability appraisal may be a useful approach to doing this. There is also the issue of Strategic Environmental Assessment to consider.
4. Comments on Organpool Farm – The site has been appraised within the SSR and that is helpful for all parties concerned noting the need to appraise all sites and suitable alternatives to any sites identified for development.

An appraisal of the site at Organpool Farm is made at various points in the SSR. The Site Selection Matrix provides a summary of key issues against stated criteria. Reference is made to the site at paragraph 3.29 in terms of the possibility of it being a site allocation. Appendix 2 provides commentary in the context of a Site Survey Form.

In response to the Matrix, the key points to make are firstly, while the site is not, at present, identified in the draft Strategic Allocations DPD the site has been put forward by WSL for its inclusion. The relevant process will determine whether it is included. If it is then that, potentially, has implications for the delivery of development at North Bradley through the Neighbourhood Plan process. Further, we are not aware of any assessment being made through the SHELAA process as the site as only recently been submitted to Wiltshire Council for consideration.

Secondly, in terms of 'Local Issues and Conditions' WSL are confident a development of an appropriate scale and character can be delivered taking into account local housing needs. There are constraints that need to be taken into account but WSL is confident that they can be satisfactorily addressed. This comment is made taking into account highway, drainage, landscape and ecology issues in particular. A full team of specialist consultants is working on behalf of WSL to ensure that any technical issues are capable of being addressed with mitigation put in place as appropriate. As stated earlier, the scale of development is a matter for further consideration and WSL is confident that it could deliver a scheme that performs as well if not better than the alternatives noting the conclusions as stated in the SSR starting at Paragraph 3.38.

Finally, on this point and with reference to the Site Survey Form we note that in respect of the conclusions against each of the stated criteria no adverse points are made apart from those made under the 'Other' heading. However, as stated previously, there is potential for the site to be delivered through the draft Site Allocations DPD process and the scale of development will be consistent with local needs as confirmed through the relevant evidence base.

We appreciate that we have outlined a number of points above which are submitted at this time to allow the Parish Council the opportunity to consider how the Neighbourhood Plan is to be delivered and its content. The comments are made in a constructive and positive

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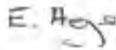
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manner. To further our dialogue regarding the Plan we were wondering whether it would be possible to speak to the Parish Councils planning consultant/advisor? This could be beneficial in terms of discussing the points raised above and for WSL to understand the programme for delivery of the Neighbourhood Plan. We look forward to your thoughts on this matter.

We trust the comments as set out are of assistance. We look forward to hearing from you regarding the possibility of meeting with your appointed planning consultant/advisor and would also welcome the opportunity to discuss the site further with the Parish Council if considered beneficial.

Yours faithfully



Director
Heynes Planning Ltd

For and on behalf of Heynes Planning Ltd

Company Reg. No. 07804734

Registered Address : Two Acres . Under Lane . Newmills . Launceston . Cornwall . PL15 8SN

www.heynesplanning.co.uk

Response to Agent's Letter Regarding Organpool Farm from Steering Group

Dear Mr. Heynes,

Thank you for your letter dated 26th April. In response to the points you make we can comment as follows:

1. Regarding the meeting 9th April and the publication of our Site Selection Report (SSR) we can confirm that the Parish Council does not support your proposed site as Organpool Farm for the reasons stated. We will therefore not be taking this forward in our neighbourhood plan.
2. Your point No 1. 'Reference to NDP'
The Neighbourhood Plan Draft has been created and is emerging. This was based on evidence gathered during production of the Scoping Report and early community engagement (recorded in the draft Consultation Statement). Clearly however it was not possible to publish the draft NDP until the SSR was completed. The next step is to have the draft plan Screened, following which Regulation 14 consultation will begin with the full suite of documents. The plan therefore flows from the evidence and not the other way around as you suggest. You should remember that the current phase of consultation is additional to that required by the regulations and full pre-submission consultation will follow at which all documents will be available.
3. The SSR responds to the evidence base, including the HSAP as it currently is, and can scarcely do otherwise. We have no intention of delaying the NDP since the NDP presents an alternative strategy for housing delivery compared with the HSAP and this is currently being discussed with Wiltshire Council in accordance with NPPF and PPG.

We are surprised at your question concerning 'paragraph 2.5 whereby land outside of Trowbridge is needed in terms of meeting the town's needs?', since this is revealed by a basic understanding of the planning policy context. We refer you to Core Policy 29 the supporting text of which states:

'An additional 950 dwellings will then be developed at the town only once improved secondary school provision is in place towards the end of the plan period and there has been a further assessment of effects on protected bat species and their habitats to ensure that they are properly safeguarded'. It adds: 'Further land for housing development at Trowbridge will be identified in the Housing Site Allocations DPD'. The task of the HSAP is to take this forward as explained in that document and its Topic Papers. NOTE: terms 'at the town' and 'at Trowbridge' mean outside the town but in the Trowbridge Community Area near to Trowbridge. This includes North Bradley parish.

The HSAP and HSAP Topic Paper 4 explain further, for example:

'Plan allocations are focused on Areas of Search to help ensure that the remaining requirement for the HMA can be met. These are Principal Settlements and Market Towns and their rural hinterland, the 'community area remainder'; where it was considered necessary to identify additional land at Large Villages(18) in order to promote surety of supply and help achieve the minimum level set for the HMA in the WCS'.

5. Sustainability Appraisal. The Plan will be screened according to the Regulations and, if required, an SEA will be produced. There is no requirement for an NDP to produce an SA.

6. The Organpool Farm site has been put forward (as any site can be), however it is most unlikely that it will be incorporated in the HSAP for the same reasons we give in opposing it, and the fact that it lacks community support. The mere fact of submission carries no weight therefore.
7. We disagree with the assertion made concerning the possibility of achieving a satisfactory scheme on the Organ Pool Farm site. We would also point out that the planning system is: *'..genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'*. (NPPF Core Planning Principles bullet 1). It is clear from the community engagement regarding the NDP that the community opposes Organ Pool Farm as a site and we will be making that clear to Wiltshire Council with a recommendation that they adopt the strategy of the North Bradley NDP over that in the existing HSAP draft and reject any approach that would mean the meeting of basic strategic need through un-planned speculative applications.
8. We would suggest therefore that you take the opportunity of our forthcoming Regulation 14 consultation to express any further views that you might have.

We are sorry that we cannot be more helpful, however there is no local support for your scheme and we will therefore not be taking it forward.

North Bradley

Parish Housing Needs Survey

Survey Report

February 2018

Wiltshire Council
County Hall, Bythesea Road, Trowbridge BA14 8JN

Contents	Page
Parish summary	3
Introduction	4
Aim	4
Survey distribution and methodology	5
Key findings	5
Part 1 – Households currently living in the parish	5
Part 2 – Households requiring accommodation in the parish	9
Affordability	13
Summary	14
Recommendations	15

1. Parish Summary

The parish of North Bradley is in the Trowbridge Community Area within the local authority area of Wiltshire. North Bradley is a village and civil parish between Trowbridge and Westbury, about 1.75 miles south of Trowbridge town centre. The parish includes most of the village of Yarnbrook and the hamlets of Brokerswood and Drynham.

Although close to Trowbridge, North Bradley retains a distinct identity, separated by a number of small fields including one which is the home to Trowbridge football club. This 'gap' provides a rural setting for the village preserving its distinct character and sense of place. The majority of the fields are used as farm land, agricultural crops and for sheep and cattle.

The north-south road through the village was formerly the A363 but this was diverted to the north in the late 1990s when the White Horse Business Park was developed.

The parish extends southwest beyond Brokerswood to the boundary of Somerset, near Rudge. The river Biss follows the same northeast southwest axis.

Reference is made in the Domesday Book to North Bradley being part of the manor of Steeple Ashton. Earlier remains dating from Roman times have also been found.

A Baptist church was established in North Bradley in 1775 and a chapel opened in 1780. In 1961 a new building was opened on the same site and the old building demolished. The original graveyard which contains some listed tombs still remains.

The Anglican Church of St Nicholas is Grade II listed. Dating from the 15th century, it was restored in 1862.

All Saints Church at Brokerswood is a "tin tabernacle" built with corrugated iron. First erected in Southwick, it was reassembled at Brokerswood in 1905.

While there is significant heritage within the parish, the majority of development is more modern. Terraces and semi-detached brick villas of the nineteenth and early twentieth centuries line Woodmarsh, ex-A363, while to the south and southwest of this is located the majority of post war estate style housing that makes up the bulk of the village's building stock. Much of this dates from the 1970's and consists of detached and semi-detached houses and bungalows. Only a small proportion of this is social housing, the majority of properties having been sold under the Right to Buy scheme.

The busiest roads of the parish are in the north-eastern end, close to the main built up area. Despite the diversion of the A363, the volume of traffic between the business park and the A350 at Yarnbrook can be extreme. Similarly, the road linking North Bradley to Southwick brings high volumes of traffic including heavy goods vehicles.

There are two public houses in the parish, The Rising Sun in the centre of North Bradley and the Longs Arms in Yarnbrook. There is a thriving primary school with an attached pre-school.

There are two much used community halls: the Peace Memorial Hall with its popular playing field and playground and the Progressive Hall. Both halls offer a variety of activities.

2. Introduction

In Autumn 2017, Wiltshire Council's Development Officers discussed carrying out a rural housing needs survey with North Bradley Parish Council, to establish if there was a proven need for affordable housing in the parish and potentially to use the findings of the survey to inform the parish plan.

Such surveys assist officers in identifying those areas with the greatest housing problems so that scarce financial resources can be put to best use.

Experience has shown that these surveys need to be carried out at regular intervals if the results are to remain relevant in identifying trends.

- The Principal Development Officers are employed by Wiltshire Council's Service Development and Enabling Team to assist in the delivery of new affordable housing.
- The Principal Development Officers work closely with rural communities, housing associations, local authorities and landowners to meet the affordable housing needs of rural communities.
- The survey is funded by members of the Wiltshire Rural Investment Partnership (WRIP).¹
- 'The Wiltshire Rural Investment Partnership brings together representatives from the economic development, regeneration, spatial planning, service development and enabling teams of Wiltshire Council together with Registered Provider [housing association] partners and the Homes and Communities Agency to enable and promote the sustainable delivery of new build housing in the rural communities of Wiltshire.'²

3. Aim

The aim of carrying out the survey is to investigate the affordable housing needs of local people (or those who need to live in the parish) in North Bradley parish.

- 'Housing need' can be defined as the need for an individual or household to obtain housing that is suitable to their circumstances.
- It implies that there are problems or limitations with the household's current housing arrangements and that the household is unable to afford or to access suitable accommodation in the private sector.
- Such problems may be concerned with housing costs, size, location, layout, state of repair, or security of tenure either immediately or in the future.

¹ The members of WRIP that contribute to the survey funding are Wiltshire Council and six Registered Providers of social housing (housing associations) - Aster, GreenSquare, Guinness, Stonewater, Selwood Housing and Wiltshire Rural Housing Association.

² Para 1.1, 'Purpose', *Terms of Reference for the Wiltshire Rural Investment Partnership*. Full WRIP membership: Wiltshire Council, Aster, Wiltshire Rural Housing Association, GreenSquare, Guinness, Stonewater, Selwood Housing, the Homes and Communities Agency, and the Wiltshire Community Land Trust.

4. Survey Distribution and Methodology

In order to carry out the housing needs survey, questionnaires were delivered to the Parish Council for distribution on the 13 November 2017.

To encourage a good response, households were given a pre-paid envelope in which to return the completed survey. The council applies the data protection policy to responses, ensuring that all survey responses remain anonymous.

Residents were asked to return the completed surveys in the pre-paid envelopes by 18 December 2017. The forms were recorded and analysed by the Service Development Officers at Wiltshire Council.

- A total of 767 questionnaires were distributed to the parish.
- Everyone was asked to complete the first section of the form.
- If a household considered itself in need, or likely to be in need of affordable housing within the next five years, it was invited to complete the rest of the survey.
- There was a good response rate of 34.0% with 261 replies received.
- This report describes the views only of the residents who returned the questionnaires and these views may not be representative of the wider population of North Bradley.
- 6 responses were made online.

5. Key Findings

This report is divided into two parts. The first section looks at existing households in the parish in order to provide a description of the current housing in North Bradley. This section also describes the levels of new housing, if any, which would be supported by respondents to the survey.

The second section examines the households who have declared a need for new housing in North Bradley. The section begins by describing the overall need for both market and affordable housing in the parish. A financial assessment is then made in order to determine the numbers of households who have a current need for new affordable housing. The results of this assessment are summarised in the recommendations of the report (Section 8).

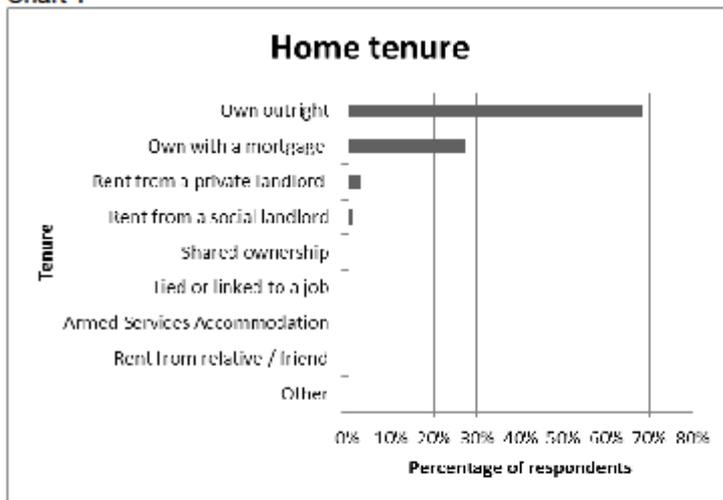
Part One – Households currently living in the parish

The first question asked on the survey was whether the respondents' home in North Bradley was their main home. 99.6% of those who replied said that it was.

The 2011 Census data for North Bradley indicates that 87.2% of households in the parish were owner-occupying, 4.3% were renting from social landlords, 7.7% were privately renting, 0.4% were shared owners and 0.4% of households were living rent free.³

The chart below shows the tenure of respondents to the survey. The majority (95.8%) of respondents were owner-occupiers, while 3.1% were renting from a private landlord or letting agency, 1.1% of respondents were living in socially rented properties, none were living in shared ownership properties, accommodation tied to their employment, or renting from a relative or friend and 0.0% living in a tenure described as 'other'. These results indicate a bias in the survey responses toward those living in owner-occupied homes and the rest of this section should be read with this in mind.

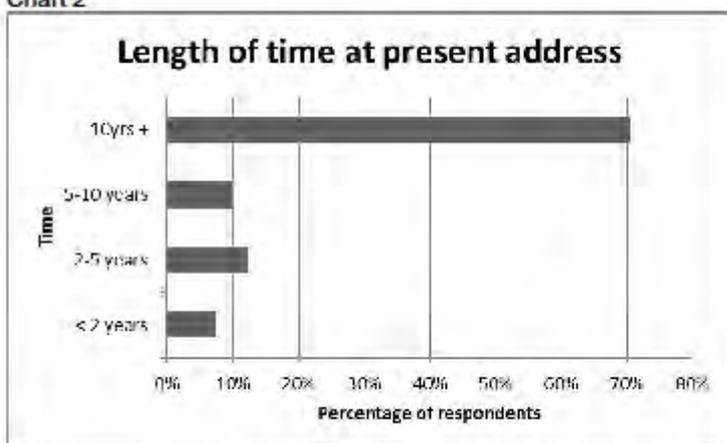
Chart 1



³ <http://www.nomisweb.co.uk/>

The chart below indicates the length of time that respondents have lived in their current home. It shows that the majority of people who responded to the survey have lived in the parish for more than ten years, which is appropriate for the high levels of owner occupation among survey respondents:

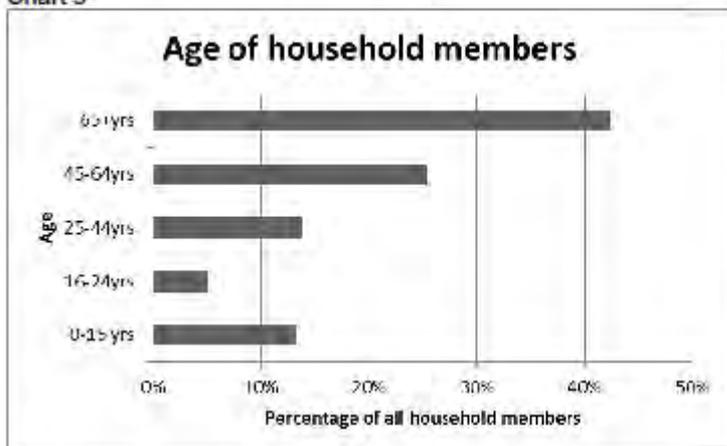
Chart 2



Many respondents to the survey lived in medium to large family homes, with 37.2% of respondents having four bedrooms in their property. 33.3% lived in three bedroom homes, 19.5% had two bedrooms, 7.3% had five or more bedrooms and 2.7% of respondents lived in homes with one bedroom.

The spread of ages recorded in the survey indicates that over a third (42.4%) of respondents' household members were aged 65+:

Chart 3



As shown in the chart above, there were significant numbers of households responding to the survey with members aged 25-64 and with children aged under 16. This indicates a spread of different household types in North Bradley, from older person households with fewer members, to younger households with children.

The distance travelled to work can also be a good measure of the sustainability of local housing development, as more people working locally can indicate an ongoing need for local housing. The table below shows how far people in the respondents' households travelled to work:

Table 1

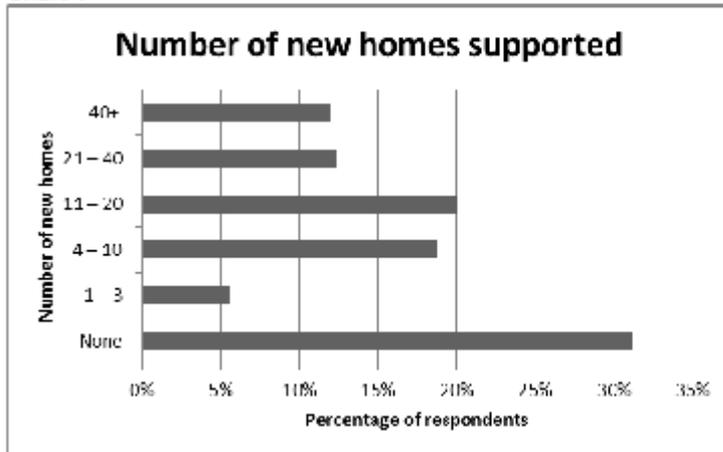
Persons in household	Distance to work				Total
	Up to 2 miles	2 - 10 miles	10 - 50 miles	50 miles +	
Person 1	28	54	30	10	122
Person 2	15	31	28	2	76
Person 3	3	4	3	0	10
Person 4	3	2	1	0	6
Person 5	1	0	0	0	1
Total	50	91	62	12	215

These results suggest a mixed level of sustainability for new housing development in North Bradley, indicated by the survey respondents' access to local sources of employment. While 66% of the households' working members usually travel less than ten miles to their place of work, 34% travel more than that, suggesting a potential lack of more local sources of employment.

Respondents were also asked whether anyone currently living in their household would need separate accommodation in the parish now or in the near future, to which 2.8% of respondents (seven households) answered 'yes', indicating a low level of sustained need for housing in the parish.

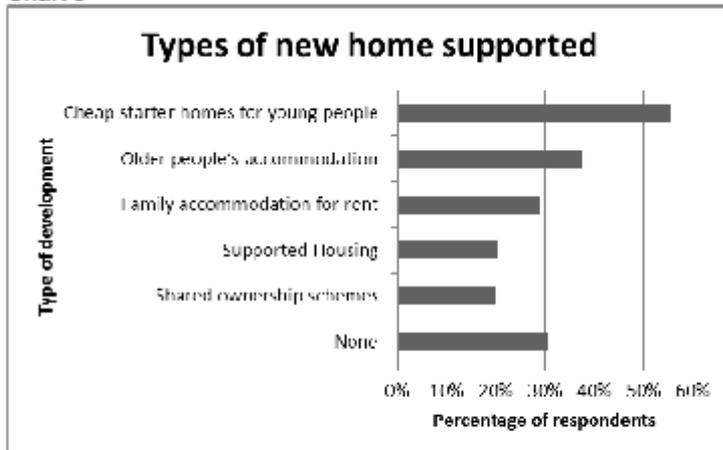
Respondents were then asked how many new homes they would support being built in the parish. The majority of respondents (68.8%) were in support of some new housing in North Bradley, with the most popular option (20.0% of respondents) being for between eleven and twenty new homes. 31.2% of respondents were opposed to any new housing in North Bradley parish:

Chart 4



Respondents to this section were finally asked what types of housing development, if any, they would support. The types of housing considered most needed in North Bradley by the survey respondents were affordable starter homes for young people (55.5%) and older persons' accommodation (37.7%). Full results are given in the chart below (more than one answer could be given):

Chart 5



Part two – Households requiring accommodation in the parish

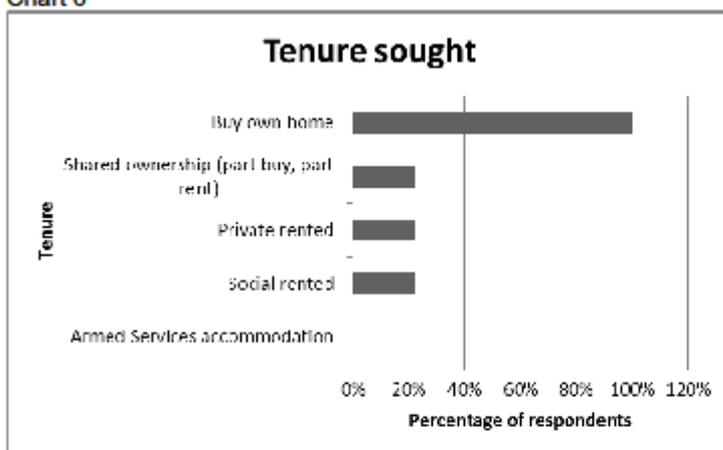
This section of the report looks initially at all the responses to section two of the survey in order to give a broad picture of the need for both market and affordable housing in the parish. A financial assessment and an evaluation of the current affordable housing in North Bradley are

then made in order to describe in more detail the need for specifically affordable (i.e. non-market) housing.

Ten respondents replied to this section of the survey, indicating their need for housing in North Bradley. The most frequent reasons given for needing to move were their current home is too small (four households), to move to cheaper accommodation (three households), they are currently renting and want to buy (three households) and that respondents want to be closer to friends/other family (three households). More than one reason could be given.

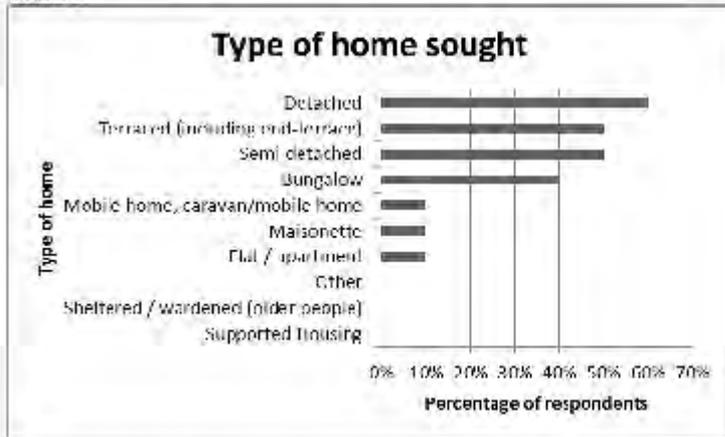
The respondents requiring accommodation in the parish were asked what type of tenure they sought. The expressed need was for all types of tenure, with home ownership being the most desired. Households could indicate more than one response:

Chart 6



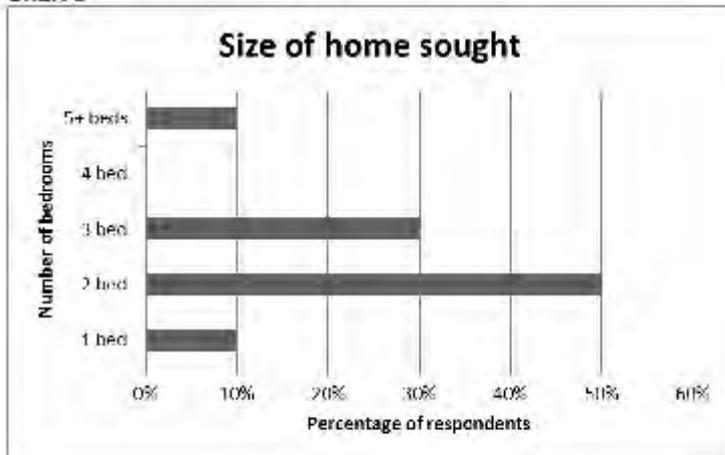
Respondents to this section were also asked what type of housing they required. The most sought-after type was detached properties. Full responses are given in the chart below (more than one answer could be given):

Chart 7



In terms of size, the most popular option was for two bedroom homes and respondents also expressed a need for properties with one, three and five or more bedrooms. No need was declared for homes with four bedrooms:

Chart 8



The respondents were then asked if there was a lack of suitable existing housing in North Bradley to meet their needs, to which six households answered 'yes'.

In order to assess the need for affordable housing in North Bradley, it is necessary to consider the equity, income and savings levels of respondents. Please note that due to the need to preserve the confidentiality of respondents, only a short summary of the financial assessment is presented below.

Only one of the households responding to this section of the survey reported having equity in an existing property. Estimated levels of savings among the respondents were varied with two respondents declaring savings of between £0 and £2,499. Two respondents reported savings of between £5,000 and £14,999. Two households declared debts of up to £5,000. Four households did not provide any information on savings or debt.

In relation to income levels six of the ten households reported gross incomes of between £9,500 and £24,499pa. Three respondents reported a gross household income of over £26,000pa. One respondent did not disclose any financial information. The median gross income bracket reported by the nine households that responded was £21,500 to £22,999pa.

Comparing income, savings and equity levels with affordability in North Bradley suggests that only one household would require public assistance in order to achieve their required housing and so would be considered 'in housing need' as defined in Section 3 of this report.

Three of the households responding specified that they would like to purchase, rather than rent a new home. However assessing the income and saving levels declared by those households they do not appear to meet the financial criteria for low cost home ownership and as such are excluded from the recommendations of this report.

Three households expressed an interest in shared ownership however, for two of these the income and saving levels declared would indicate that they do not meet the financial criteria for low cost home ownership.

Despite the low levels of savings and equity declared in the financial assessment, three of the households responding declared that they owned their home outright and as such this would indicate the three households have the financial means to resolve their own housing through a market purchase.

One household provided inconsistent household and financial information so we are unable to determine the housing need for this household.

6. Affordability

In order to investigate affordability, further research has been carried out on house prices in the area.

It is possible to estimate the average property prices in the North Bradley area:⁴

Bedrooms	February 2018
1	£118,400
2	£174,500
3	£229,200
4	£336,600
5+	£437,500

Example calculation for a mortgage

Typically, a household making a single application can obtain a mortgage of 3.5 times their annual income, or 3x annual income for joint applications. Households would generally expect to need a deposit of around 15% of the total price.

If an average two-bedroom property sold in North Bradley cost £174,500 then a household may require £26,175 as a deposit. Annual household income would have to be at least £42,379 for a single applicant or £49,442 for joint applicants. The Annual Survey of Hours and Earnings indicates that the gross annual median income of employed persons in Wiltshire in 2016 was £21,817.⁵

- It would be unlikely that a household would be able to purchase a property in this parish without a large deposit, some equity in an existing property or a substantial income.

⁴ House price estimates from the Mouseprice local area guide to the BA14 postcode area, www.mouseprice.com/area-guide/average-house-price/. Please note that the BA14 postcode covers a wider area than Southwick parish and that there may be significant internal variation in house prices.

⁵ Annual Survey of Hours and Earnings, 2016, resident analysis. Gross annual pay of employed persons resident in Wiltshire, www.nomisweb.co.uk. Note that while the mortgage calculation refers to household income, i.e. to the combined income of all persons in the home, the ASHE figure refers to individual income.

7. Summary

This survey's recommendations (see Section 8 below) concentrate on those households who are unable to afford accommodation on the open market.

This is just a quarter of the research needed for this assessment: the Housing Register of Wiltshire Council, the local Strategic Housing Market Assessment and the advice from allocation staff who manage the Register must also be taken into account.

- In January 2018, there was one household on the Wiltshire Council Housing Register seeking affordable accommodation in North Bradley parish.
- The 2011 Census recorded thirty one social homes in the parish.⁶ These properties represent 4.3% of the total housing in North Bradley, which is lower than the Wiltshire affordable housing average of 14.7%.⁷
- The social housing in North Bradley has a low re-let rate. From the fourth quarter of 2016/2017 to the third quarter of 2017/2018 there was a zero re-let rate. No social homes were re-let in the parish.⁸
- The very low levels and turnover of social housing in the parish suggest that none of the households responding to section two of this survey and in need of affordable accommodation could meet their needs through accessing the existing social housing of the parish.
- Of the ten respondents to Part 2, three declared they were outright owner occupiers with no mortgage or loan attached to the property. Whilst no savings and equity were disclosed, it would indicate that those households may be in a position to resolve their own housing through an open market purchase. One of these households expressed a desire to move out of the parish, to a nearby town.
- Three of the ten household's specified in their survey response that they were seeking to buy rather than rent. These households declared limited savings and fell into the median income bracket. However given these household's preference for home ownership, they have not been included in the recommendations of this report for new subsidised rented homes.

⁶ Table QS405EW, 2011 Census: Tenure – Households, English parishes / Welsh communities.

⁷ Table QS405EW, 2011 Census: Tenure – Households, local authorities in England and Wales.

⁸ Wiltshire Council, Housing Strategy, live tables.

8. Recommendations

This survey's recommendations concentrate on households unable to afford accommodation on the open market.

The following indicates the minimum need over the next three years for new affordable housing development in the parish, based on the responses to the survey. The recommendations describe a snapshot of the need for affordable housing at the time the survey was conducted and do not take account of future changes in need, for example arising from the changing housing needs of employees of local businesses. The recommendations may not represent the parish's full housing need as responses were not received from every household, for example households which are on the Housing Register but have not completed a questionnaire are not included in these recommendations (see Section 7). In order to fully assess the housing need in the parish, the recommendations need to be considered alongside evidence provided by Wiltshire Council's Housing Register, the Strategic Housing Market Assessment, and the advice of allocation staff who manage the Register.

Subsidised rented housing ⁹

- None

Shared ownership / discount market homes¹⁰

- 1 x 1 bed

Sheltered housing for older people

- None

⁹ Please note that recommendations for numbers of bedrooms in subsidised rented properties are where possible made in line with the 'family size' criteria implemented as part of the Housing Benefit changes by the 2012 Welfare Reform Act.

¹⁰ Please note that recommendations for numbers of bedrooms in shared ownership/discounted market properties are based on the number of bedrooms wanted by respondents, applicants can purchase the size of home they are able to afford.



North Bradley Parish Newsletter Spring 2018

produced and edited by North Bradley Parish Council
for the people of NORTH BRADLEY, BROKERSWOOD AND YARNBROOK
parishcouncil@northbradley.org.uk
www.northbradley.org.

Welcome to the Spring Newsletter

Chairman's address

I feel slightly embarrassed to call this the Spring Newsletter having just experienced the most severe snowfall for a very long time. Snow and the dramatically low temperatures have given the spring flowers that were showing a very unpleasant battering.

Following Tony Deacon's resignation we warmly welcomed Pastor Ben Midgley on to the Parish Council as a co-opted Councillor.

We are progressing extremely well with our Neighbourhood Plan. The Steering Group has met on a regular basis to progress its development. Thank you to all our residents who completed the Housing Needs survey in December and we look forward to seeing as many of you as possible at our consultation events at the Baptist Church Hall later in March. We need to provide as much evidence as possible about where and what housing the residents wish for their parish and reflect this in the plan as inspectors are getting more and more critical.

There is more information about the Neighbourhood Plan within this Newsletter.

Councillor Roger Evans
Chairman

Neighbourhood Development Plan

Thank you to those of you who completed the **Housing Needs survey**. There was a response of 34% of replies received, an excellent response for a survey of this type. We need to provide robust evidence to support our neighbourhood plan and you have helped us to do this. Thank you.

Here are the survey results:

You can read the report by clicking on the following link:

http://www.northbradley.org.uk/images/Housing_Need_Survey_February_2018.pdf

David King, of 'PlanningStreet', our planning consultant, has combined the information from the Housing Needs Survey with surveys of sites carried out by the Steering Group and has produced a draft **Site Selection Report**. You can read this updated draft report by clicking on the following

link: http://www.northbradley.org.uk/images/SSR_270218_editedDK_1.pdf

We have delivered or posted surveys to all residents within the parish for their comments.

Because neighbourhood planning must represent the wishes of the community it is important that community involvement plays a part in site selection. No decisions have been made yet, so we would urge you to complete the survey and bring it along to one of the Community Engagement Events taking place at North Bradley Baptist Church on Friday 16 March 5.30 – 7.30 p.m. and Saturday 17 March 10.00 – 12.00 a.m. & 2.30- 4.30 p.m.

The results of the questionnaire will be collated and a summary produced to inform a final Site Selection Report. This will then inform the draft neighbourhood plan, which will go out to its 'Regulation 14' 6-week community consultation in the summer.

Traffic calming measures in North Bradley - The Woodmarsh Traffic calming scheme is making progress. A full topographical survey has now been completed and the actual design work is about to start. Once completed the preliminary design/options can be issued to the parish for consultation and agreement, following which the advertisements can be confirmed. This work will take a few weeks but progress is being made and will be carefully monitored by the parish council.

Horace Prickett,
Portfolio Holder for Transport.



Easter is almost here, so would you like a day out in Salisbury? Did you know that you can have eight hours in the city for around four pounds if you have a Senior's Bus Pass? Wiltshire Council have negotiated with First Group to accept bus passes on the 09:10 from Warminster, which is the 08:36 from the Business Park (Sat. 08:42) and arrive Salisbury 10:05. The fare to Warminster is around four pounds, then your bus pass gives you free travel on to Salisbury, and back again, leaving Salisbury at 18:05. You thus have around 8 hours in the City to see Magna Carta, the cathedral, the Wiltshire Regiment museum, the market and many more sites of interest. However, you must validate your pass when the bus gets to Warminster, or you need to pay again. No need to change buses, it's the same service! Eight hours to explore the City of Salisbury, must be a bargain. It would cost you more than that to park if you went by car!
Cllr. Horace Prickett, Transport Portfolio Holder.

Latest news from our Police Community Support Officer

We are delighted to welcome PCSO Melissa Gover as the new PCSO for the Trowbridge Rural area. She would like to meet North Bradley residents and if you see her please say 'hello'. She recently warned us that there has been a spate of motor, motor bike and bicycle thefts across Trowbridge and Westbury in recent weeks. To improve security of people's possessions she asks residents to remember the following advice:

- Ensure that your vehicles are properly secured and make sure you have approved locks or chains on your bikes.
- Make note of your serial number of your bicycle, this can usually be found either on the handlebars or the underside of the frame.
- Consider marking parts of your motorcycle with your vehicle identification number (VIN), vehicle registration and postcode. By marking all parts of your bike, it makes it more difficult to sell the bike down for parts. This can be done with a UV pen or Smartwater.
- Always report any suspicious activity, note any vehicle registrations, descriptions of persons involved and direction of travel

In addition, now that we are keen to get out into the garden please take the following precautions: Keep garages and sheds locked and closed at all times. It is tempting to leave doors open while working in the garden, but this gives thieves the opportunity to look and see if there is anything worth stealing. We receive frequent reports of thefts of garden equipment and other items from unlocked sheds and garages, sometimes while the owner is working in the garden or has just popped inside the house. Items stolen from unlocked sheds will probably not be covered by any household insurance. It would also be useful to mark any items of value – lawnmowers, hedge trimmers, strimmers and chainsaws are all easily sold on at car boot sales and in online sales. If they are clearly marked with your name and address including postcode they are harder to dispose of. This in turn means they are not so attractive to thieves. Marking does not need to be anything costly; a small amount of left over gloss paint and a small paintbrush will do a good job. Making sure items are clearly marked makes them unattractive to thieves and also increases the chance of them being returned to you in the event that they are recovered by police.



WE REMEMBER Cyril N Were 09.01.1918

- **4 January 1918** - British hospital ship "Rewa" sunk by submarine in Bristol Channel.
- **10 January 1918** - British Government assure Russian Bolshevik Government of their support in the creation of an independent Poland.
- **14 January 1918** - German destroyers bombard Yarmouth (Norfolk).
- **10 February 1918** - British S.S. "Tuscania" carrying United States troops, sunk by submarine off Irish coast.
- **24 March 1918** - German Spring Offensive - end of the Battle in Flanders. Germany had gained over 1,000 square miles of Allied-held territory in a few days, the casualties suffered by the Germans are recorded as 31,000 killed, 20,000 missing and 190,000 wounded. The German offensive resulted in 160,000 allied casualties killed or wounded and 90,000 men taken prisoner.
- **March 21, 1918** - Germany's all-out gamble for victory begins. A five-hour 6,000-gun artillery bombardment with 65 divisions from the German 2nd, 17th and 18th Armies attack the British 3rd and 5th Armies along a 60-mile front in the Somme. The thinly stretched British 5th Army is quickly overrun and wrecked. Using effective storm troop tactics, the Germans recapture all of the ground they lost in 1916 during the Battle of the Somme and press forward. However, during the two week offensive, the British 3rd Army manages to hold itself together and prevents the Germans from taking Arras and Amiens, key objectives of the offensive.
- **March 26, 1918** - At a conference in Doullens, France, the British and French agree to appoint an Allied Supreme Commander on the Western Front, in place of the separate commanders they had been using, to better coordinate their efforts. Ferdinand Foch, Petain's highly regarded chief of staff, accepts the position



GET YOUR PAINTS, PENCILS AND CAMERA'S ON THE READY FOR A COMPETITION

TO COMMEMORATE 100 YEARS SINCE THE END OF WORLD WAR 1 NORTH BRADLEY PARISH COUNCIL WILL BE RUNNING A PAINTING AND PHOTOGRAPHY COMPETITION THAT REFLECTS THE WORD

'PEACE'

CLASSES FOR EITHER PAINTING OR PHOTOGRAPH ARE

AGED UP TO 8 YEARS OLD

9 – 15 YEARS OLD

16 AND OVER

JUDGING WILL BE ON SATURDAY 10TH NOVEMBER 2018 AT THE PEACE MEMORIAL HALL.

MORE DETAILED INFORMATION ON THE COMPETITION WILL BE GIVEN OUT OVER THE NEXT FEW MONTHS.

WHAT'S ON?

North Bradley W.I 8 p.m Second Wednesday of Every Month at Peace Memorial Hall
Contact : Shirley Kemp 01225 35333.

Ladies Group North Bradley. 8 p.m Fourth Tuesday of Every Month at Peace Memorial Hall.
Contact : Karen Grant 01225 769230 We are always pleased to see new members

Autumn Leaves

This is the club for older people, primarily from the village. Meetings are bi-weekly on Thursday afternoons, 2.00 - 4.00pm. A wide range of events & activities take place, including some outings, full details on program page. For details please contact Pat Doel on 01225 761400 or Jenny Joyce on 01225 767505.

Appendix 7: SEA and HRA Screening Decisions
First SEA July 2018

Wiltshire Council

Strategic Environmental Assessment

**Final screening determination for the Draft North Bradley
Neighbourhood Plan**

July 2018

Contents	Page
1. Introduction	3
2. Legislative requirements	3
3. The Draft North Bradley Neighbourhood Plan	5
4. SEA Screening assessment	6
5. SEA Screening decision	14
Appendix A - Statutory consultee responses to screening decision	

1. Introduction

- 1.1 This document provides a draft screening determination of the need to carry out a Strategic Environmental Assessment (SEA) of the draft North Bradley Neighbourhood Plan (NP).
- 1.2 Wiltshire Council, as the 'Responsible Authority'¹ under the SEA Regulations², is responsible for undertaking this screening process of the draft North Bradley NP. It will determine if the plan is likely to have significant environmental effects, and hence whether SEA is required.
- 1.3 This process has been carried out in accordance with the requirements of European Directive 2001/42/EC³, often known as the Strategic Environmental Assessment (SEA) Directive, which has been transposed into English law by the SEA Regulations.

2. Legislative requirements

- 2.1 The Localism Act 2011 requires neighbourhood plans to comply with EU legislation. The screening procedure outlined in this report meets the requirements of the SEA Directive and Regulations, as introduced in Section 1 of this document.
- 2.2 Regulation 5 of the SEA Regulations requires an environmental assessment of plans which:

1. *are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use (Regulation 5, para. (2)(a), and which set the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC (EIA Directive) on the assessment of the effects of certain public and private projects on the environment (Reg. 5, para. (2)(b)*
2. *in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive (92/43/EEC) (Reg. 5, para. (3)*
3. *set the framework for future development consent of projects⁴ (Reg. 5, para. (4)(b)*
4. *are determined to be likely to have significant environmental effects as determined under regulation 9(1) (Reg. 5, para. (4)(c)*

An environmental assessment need not be carried out for:

- a) *plans which determine the use of a small area⁵ at local level (Regulation 5, para. (6)(a); or b) plans which are a minor modification⁶ to a plan or programme (Regulation 5, para. (6)(b) unless it has been determined under regulation 9(1) that the plan is likely to have significant environmental effects.*

¹ The organisation which adopts the neighbourhood plan (this is described in Wiltshire Council's guide *Neighbourhood planning – a guide for Wiltshire's parish and town councils* (June 2012) as 'makes the plan').

² The Environmental Assessment of Plans and Programmes Regulations 2004

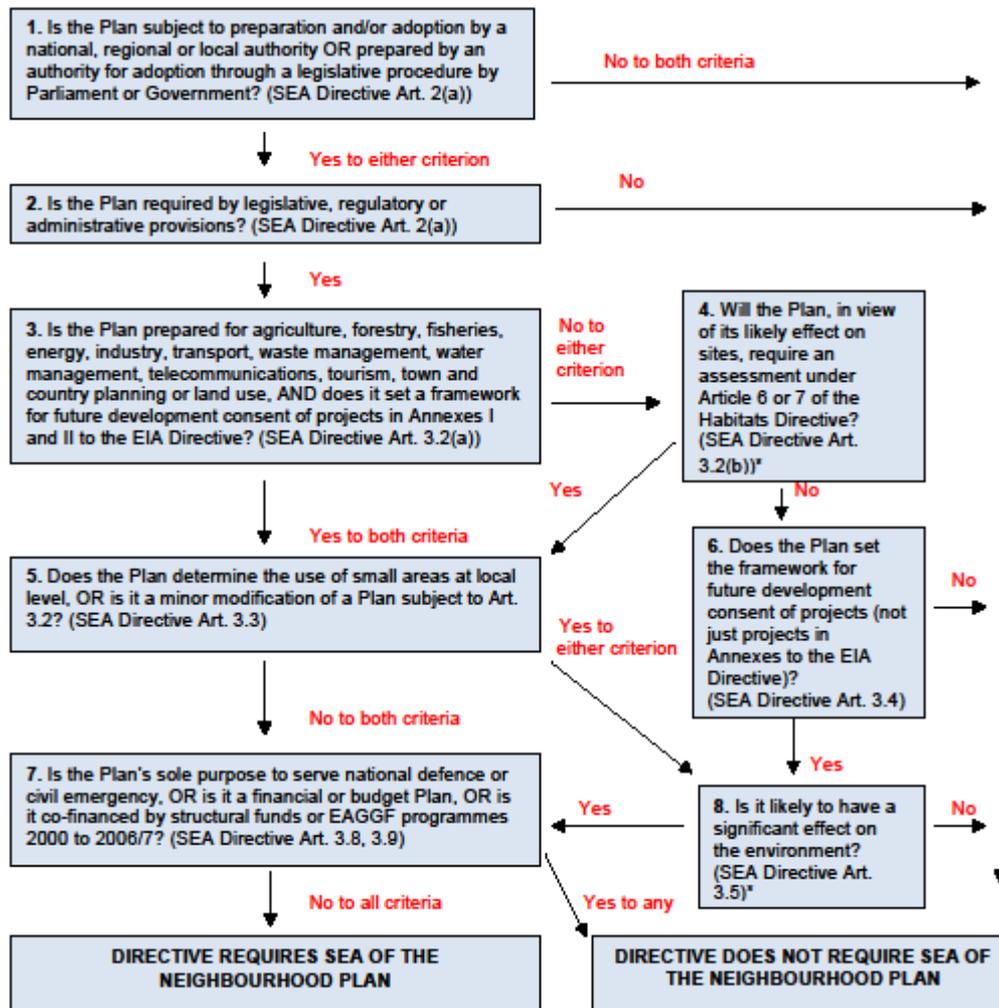
³ European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment"

⁴ European Commission guidance states that plans and programmes which set the framework for future development consent of projects would normally contain 'criteria or conditions which guide the way a consenting authority decides an application for development consent'. Development consent is defined in the EIA Directive as 'the decision of the competent authority or authorities which entitled the developer to proceed with the project' (Article 1(2) of the EIA Directive).

⁵ European Commission guidance suggests that plans which determine the use of small areas at local level might include "a building plan which, for a particular, limited area, outlines details of how buildings must be constructed, determining, for example, their height, width or design"

⁶ 'Minor modifications' should be considered in the context of the plan or programme which is being modified and of the likelihood of their having significant environmental effects. A modification may be of such small order that it is unlikely to have significant environmental effects.

2.3 The diagram⁷ below shows the SEA Directive's requirements and its application to neighbourhood plans:

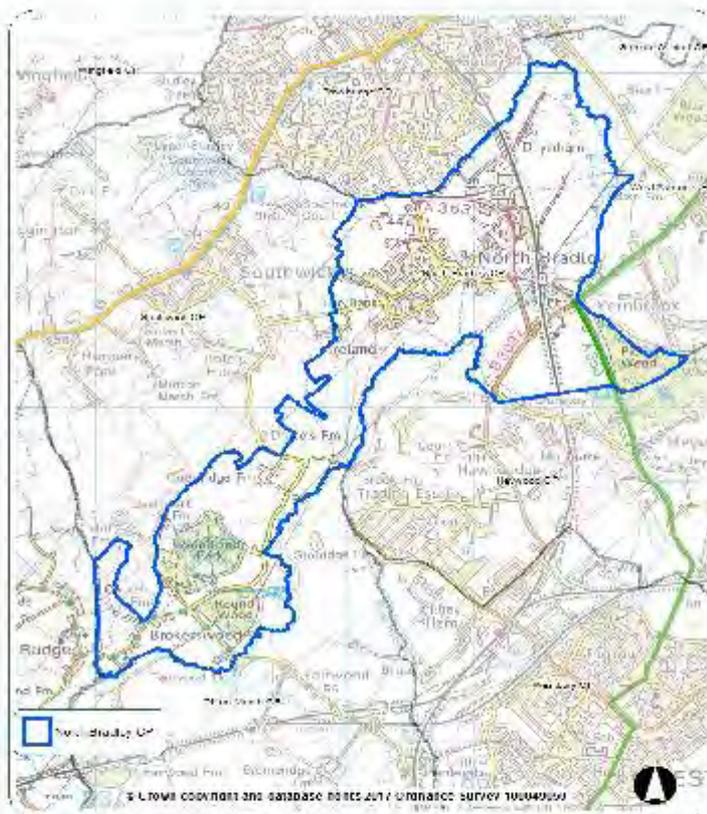


* Plans falling in this category (No.8) will be screened by Wiltshire Council to determine if they are likely to have significant environmental effects. This determination will be made on a case by case basis for neighbourhood plans coming forward in Wiltshire.

NB This diagram is intended as a guide to the criteria for application of the Directive to neighbourhood plans. It has no legal status.

⁷ Taken from *A Practical Guide to the Strategic Environmental Assessment Directive* ODPM, 2005)

3. **The Draft North Bradley Neighbourhood Plan (NP)**
- 3.1 The parish of North Bradley is preparing a NP under the provisions of the Localism Act 2011.
- 3.2 The designation of the North Bradley Neighbourhood Area was made on 4th January 2017 (see map of area outlined in blue below). For the designation notice see <http://www.wiltshire.gov.uk/planning-neighbourhood-latest-news>



- 3.3 This screening decision is accompanied by an initial draft of the North Bradley NP and a Housing Site Selection Report which sets out the reasoning for the proposed housing site allocations in the draft Plan.

4. SEA Screening assessment

- 4.1 Wiltshire Council, as the 'Responsible Authority', considers that the draft North Bradley NP falls within the scope of the SEA Regulations on the basis that it is a plan that:
- a) is subject to preparation or adoption by an authority at national, regional or local level (Regulation 2);
 - b) is prepared for town and country planning or land use and it is a plan that sets the framework for future development consent of projects generally (Regulation 5, para. 4); and
 - c) will apply to a wider area other than a small area at local level and is not a minor modification to an existing plan or programme (Regulation 5, para. 6).
- 4.2 A determination under Regulation 9 is therefore required as to whether the draft North Bradley NP is likely to have significant effects on the environment.
- 4.3 The screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations includes two sets of characteristics for determining the likely significance of effects on the environment. These relate to i) the characteristics of the draft North Bradley NP and ii) the characteristics of the effects and of the area likely to be affected by the draft North Bradley NP. In making a determination, Wiltshire Council will take into account the criteria specified in Schedule I of the Regulations as follows:

1. The characteristics of the plans and programmes, having regard in particular to:

- (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- (b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- (d) environmental problems relevant to the plan or programme; and
- (e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- (a) the probability, duration, frequency and reversibility of the effects;
- (b) the cumulative nature of the effects;

- (c) the transboundary nature of the effects;
- (d) the risks to human health or the environment (for example, due to accidents);
- (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- (f) the value and vulnerability of the area likely to be affected due to—
 - (i) special natural characteristics or cultural heritage;
 - (ii) exceeded environmental quality standards or limit values; or
 - (iii) intensive land-use; and
- (g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

The screening assessment of the draft North Bradley NP is set out below:

Criteria (Schedule 1 SEA Regs.)	Significant environmental effects likely?	Justification and evidence
1. The characteristics of plans, having regard, in particular, to:		
(a) the degree to which the plan sets a framework for projects and other activities, either with regards to the location, nature, size and operating conditions or by allocating resources	No	The neighbourhood plan covers the North Bradley parish area only. Whilst the draft Plan does set a framework for projects at the parish level, particularly with regard to the allocation of a small number of housing sites, it is not considered that the draft Plan sets a framework for a significant degree of projects or other activities.
(b) the degree to which the plan influences other plans and programmes including those in a hierarchy	No	The draft NP is produced by the local community to influence development at the local parish level. It is not considered that the draft Plan will have a significant influence on other plans and programmes or those in a hierarchy. All neighbourhood plans must be in general conformity with the strategic policies contained in the development plan for the area, contribute to the achievement of sustainable development and have regard to national policies.
(c) the relevance of the plan for the integration of environmental considerations, in particular with a view to promoting sustainable development	No	The draft NP is a land-use plan that promotes sustainable development, in general conformity with the Local Plan and national planning guidance. However, it is not a Plan specifically relating to the integration of environmental considerations, although environmental considerations are taken into account in the draft Plan. The draft NP seeks to retain its landscape setting, including its physical separation from Trowbridge and its own distinct rural character. The objectives of the draft Plan include the preservation of the rural setting and identity of North Bradley, in particular the open spaces between the village and Trowbridge, but also existing cherished green open spaces, and to protect and improve the natural and built environment in terms of habitat for wildlife.
(d) environmental problems relevant to the plan	Yes	It has been determined by Wiltshire Council, the 'competent authority' under the Habitats Regulations ⁸ , that the draft NP will require a full Appropriate Assessment (AA) due to the potential effects on the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). Regulation 5 of the SEA Regulations requires an environmental assessment of plans which 'in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive (92/43/EEC) (Reg. 5, para. (3)).' Planning Practice Guidance

⁸ The Conservation of Habitats and Species Regulations 2017

		(PPG) para D47 states that <i>'if a plan is one which has been determined to require an appropriate assessment under the Habitats Directive then it will normally also require a Strategic Environmental Assessment.'</i> In light of this, it is considered that the draft NP is likely to have significant environmental effects and therefore an SEA will be required.
(e) the relevance of the plan for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection)	No	The NP is not relevant as a plan for implementing community legislation.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
(a) the probability, duration, frequency and reversibility of the effects	Yes	<p>It has been determined by Wiltshire Council, the 'competent authority' under the Habitats Regulations⁹, that the draft NP will require a full Appropriate Assessment (AA) due to the potential effects on the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). In light of this, it is considered that the draft NP is likely to have significant environmental effects and therefore an SEA will be required, in accordance with Regulation 5 of the SEA Regulations and Planning Practice Guidance (PPG) advice.</p> <p>Planning Practice Guidance (PPG) para D48 advises that an SEA may be required for a neighbourhood plan where i) it allocates sites for development ii) the neighbourhood area contains sensitive natural or heritage assets that may be affected iii) the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.</p> <p>The draft NP proposes to allocate four housing sites for an indicative total of 90 dwellings – three at North Bradley and one at Yarnbrook. These sites have not previously been considered through an SEA of the Local Plan. Development of these sites may lead to significant environmental effects and so these will each be assessed below:</p> <p><u>The Paddock, Little Common Lane, North Bradley</u> A small site allocated for 8 dwellings. Site within flood zone 1. No known evidence of flood risk</p>

⁹ The Conservation of Habitats and Species Regulations 2017

	<p>within the site. There are no specific biodiversity or landscape designations within the site or adjacent. Likely effects are considered most likely to relate to nearby heritage assets.</p> <p>The draft NP acknowledges the presence of 'listed buildings nearby' and is duly cautious that this may restrict development below the 8 houses anticipated. However, there is no evidence that any objective heritage assessment has been carried out and no detailed assessment of layouts etc.</p> <p>The Council's conservation officer has commented that <i>'No.3 should be considered as a non-designated heritage asset as it has a considerable presence in the street and contributes to the remaining historic character of the village. Presumably the retention of the existing dwellings is anticipated and it is difficult to see how the suggested 8 dwellings would be accommodated on the site. The historic settlement pattern is largely linear, relating closely to the road layout, and significant development in depth of the whole plot (say a cul-de-sac off the High street) would be out of character with the settlement pattern and difficult to reconcile with the requirements of CP57. Further linear development of the rear portion of plot alongside the lane, whilst perhaps more appropriate in form, would exacerbate the harmful erosion of the agricultural setting of King's Farm (taking into account also associated requirements likely to upgrade the access).'</i> The conservation officer concludes that <i>'On balance I'd have to raise significant concerns that development of this site could achieve the numbers suggested in an appropriate manner which would meet the requirements of Wiltshire Core Strategy policies CP57 and 58. I would suggest that further consideration should be given to how a layout could be achieved, taking into account the constraints of the site (including highways requirements etc).'</i></p> <p><u>Park Farm, North Bradley</u> Site is within flood zone 1. No evidence of flood issues. Site is in agricultural use. There are no landscape, biodiversity or heritage designations within or adjacent to this site. The Council's conservation officer has commented that this site is less problematic from a heritage perspective, although Woodfield House is a non-designated asset of value to the character of the area and its setting will need to be carefully considered in designing an access, and that Park Farm will require assessment in due course as a potential non-designated heritage asset. She concludes that <i>'there would appear to be potential to design a scheme which could mitigate impact on the setting of this building and, taking into account that land to the north and west remains as undeveloped agricultural land, I consider that the proposed allocation is likely to be achievable from the point of view of the built historic environment.'</i></p> <p><u>54 Woodmarsh, North Bradley</u> Site is within flood zone 1. No evidence of flood issues. Site is in agricultural/equestrian use. There are no landscape, biodiversity or heritage designations within or adjacent to this site.</p>
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		<p>The Council's conservation officer has commented that this site is less problematic from a heritage perspective. The NP identifies the buildings opposite, King's Lodge and Progressive Hall as buildings which merit consideration and she agrees that these should all be potentially considered as non-designated heritage assets. She concludes that <i>'appropriate design and site layout would be required to preserve the settings of the building opposite and the rural setting of King's Lodge but there is potential for this to be achievable within the parameters proposed.'</i></p> <p><u>Land off Westbury Road, Yarnbrook</u></p> <p>This site is not included in the May 2018 Site Selection Report that accompanies the draft NP so the site does not appear to have had a detailed assessment of potential effects. The site has no landscape, biodiversity or heritage designations within or adjacent to the site. There are no designated heritage assets in the vicinity. The site lies adjacent to the River Biss and an area of flood zone 2 and 3 and therefore a site specific Flood Risk Assessment may be required for this site.</p> <p>The Council's conservation officer states <i>'I have no information about Bradley Mill House but buildings on this site appear to occupy the same footprint as the buildings shown on the historic map and the River Biss to follow its historic alignment so I would suggest therefore that this site would require assessment in due course as for potential non-designated heritage assets. Appropriate design and site layout would be required to preserve its setting and those of older cottages on the Hawkridge Road but the capacity set is relatively modest and I consider that the proposed allocation is likely to be achievable from the point of view of the built historic environment.'</i></p>
(b) the cumulative nature of the effects	Yes	<p>It has been determined by Wiltshire Council, the 'competent authority' under the Habitats Regulations¹⁰, that the draft NP will require a full Appropriate Assessment (AA) due to the potential effects on the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). In light of this, it is considered that the draft NP is likely to have significant environmental effects and therefore an SEA will be required, in accordance with Regulation 5 of the SEA Regulations and Planning Practice Guidance (PPG) advice.</p> <p>It is considered likely that the four proposed housing site allocations in the draft Plan, with an indicative total of 90 dwellings, will have significant cumulative effects on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC), in combination with other proposed housing site allocations on the edge of Trowbridge allocated within the Wiltshire Core Strategy and Wiltshire</p>

¹⁰ The Conservation of Habitats and Species Regulations 2017

		Housing Site Allocations Plan.
(c) the transboundary nature of the effects	No	No transboundary effects with other EU countries are considered likely to be significant.
(d) the risks to human health or the environment (for example, due to accidents)	No	There are no significant environmental effects considered likely to risk human health or the environment.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	No	The NP covers a rural parish which includes the 'Large Village' of North Bradley. Significant environmental effects due to the geographic size of the area and population size are not considered likely.
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	Yes	It is not considered that the draft Plan will have significant environmental effects due to exceeded environmental quality standards or limit values or intensive land-use. However, it has been determined by Wiltshire Council, the 'competent authority' under the Habitats Regulations ¹¹ , that the draft NP will require a full Appropriate Assessment (AA) due to the potential effects on the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). In light of this, it is considered that the draft NP is likely to have significant environmental effects and therefore an SEA will be required, in accordance with Regulation 5 of the SEA Regulations and Planning Practice Guidance (PPG) advice. Also, as explained under 2(a) for the proposed site at The Paddock, Little Common Lane, the conservation officer has raised significant concerns that development of this site could achieve the numbers suggested in an appropriate manner which would meet the requirements of Wiltshire Core Strategy policies CP57 and 58. It is suggested that further consideration is given to how a layout could be achieved, taking into account the constraints of the site (including highways requirements etc).
(g) the effects on areas or landscapes which have a recognised	Yes	It has been determined by Wiltshire Council, the 'competent authority' under the Habitats Regulations ¹² , that the draft NP will require a full Appropriate Assessment (AA) due to the potential

¹¹ The Conservation of Habitats and Species Regulations 2017

¹² The Conservation of Habitats and Species Regulations 2017

national, Community or international protection status.	effects on the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). In light of this, it is considered that the draft NP is likely to have significant environmental effects and therefore an SEA will be required, in accordance with Regulation 5 of the SEA Regulations and Planning Practice Guidance (PPG) advice.
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5. SEA Screening decision

- 5.1 Regulation 9 of the SEA Regulations requires that the responsible authority (Wiltshire Council) shall determine whether or not a plan is likely to have significant environmental effects. The responsible authority shall —
- (a) take into account the criteria specified in Schedule 1 to these Regulations; and
 - (b) consult the consultation bodies (Historic England, Natural England, Environment Agency).
- 5.2 Where the responsible authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.
- 5.3 Wiltshire Council considers that the draft North Bradley Neighbourhood Plan (NP) is likely to have significant environmental effects and accordingly a Strategic Environmental Assessment is required. This decision is made for the following key reasons:
- 1. It has been determined by Wiltshire Council, the 'competent authority' under the Habitats Regulations¹³, that the draft NP will require a full Appropriate Assessment (AA) due to the potential effects on the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). Regulation 5 of the SEA Regulations requires an environmental assessment of plans which '*in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive (92/43/EEC) (Reg. 5, para. (3)).*' Planning Practice Guidance (PPG) para 047 states that '*if a plan is one which has been determined to require an appropriate assessment under the Habitats Directive then it will normally also require a Strategic Environmental Assessment.*' In light of this, it is considered that the draft NP is likely to have significant environmental effects and therefore an SEA will be required.
 - 2. For the proposed site at The Paddock, Little Common Lane, the conservation officer has raised significant concerns that development of this site could achieve the numbers suggested in an appropriate manner which would meet the requirements of Wiltshire Core Strategy policies CP57 and 58. It is suggested that further consideration is given to how a layout could be achieved, taking into account the constraints of the site.
- 5.4 This SEA screening decision was sent to the SEA environmental consultation bodies, Natural England, the Environment Agency and Historic England, requesting comments within a 5-week period to 11th July 2018. All three bodies agreed with the Council's decision that the neighbourhood plan requires an SEA. Their responses are presented in Appendix A.
- 5.5 This SEA screening has been undertaken on a May 2018 draft of the North Bradley Neighbourhood Plan. If this draft Plan is subsequently amended significantly i.e. changes that substantially alter the draft plan e.g. adding, amending or removing site allocations and policies, and/or are likely to give rise to significant environmental

¹³ The Conservation of Habitats and Species Regulations 2017

effects, or the HRA screening decision is revised, this SEA screening must be reviewed. In this instance, the Qualifying Body should request a revised SEA screening assessment from Wiltshire Council.

Appendix A - Statutory consultee responses to screening decision

Historic England

From: Stuart, David
To: Way, David
Cc: Cox, David; Kilmister, Michael
Subject: North Bradley Neighbourhood Plan (Wiltshire) SEA screening decision
Date: 11 July 2018 13:55:20

Dear David

Thank you for your consultation on the SEA Screening for the emerging North Bradley Neighbourhood Plan. This is our first involvement in this Plan's preparation.

Our attention in such exercises tends to focus on whether the Plan is intending to allocate sites for development. We note that this Plan intends to allocate 4 sites to develop around 90 homes (policy 3, p33).

Evaluation of the potential impact which these allocations might have on heritage assets is greatly assisted by the report of your authority's conservation officer. This essentially concludes that Park Farm, 54 Woodmarsh, and Land off Westbury Road, Yarnbrook are likely to be acceptable allocations in principle from a heritage perspective. Delivery of the housing numbers aspired to would need to be subject to appropriate site layout and design.

In terms of The Paddock, Little Common Lane, the report refers to the identification of Listed Buildings nearby the site and the absence of an appropriate heritage assessment. In order to respect these settings and respond to the prevailing character of the area there is doubt whether the allocation can deliver the number of houses identified without causing harm to heritage assets. This issue in itself may or may not constitute a sufficient likelihood of significant environmental effects but given that Opinion has been expressed that for ecological reasons alone an SEA should be required we would advise that the heritage issues identified should be added to that agenda.

On that basis we would support the view that an SEA is required. Otherwise, the Plan raises no other issues upon which we are likely to wish to comment as it progresses, apart from an encouragement to the community to produce the Village Design Guide it aspires to. We would also take the opportunity to highlight guidance on our website relating to Setting, SEAs, Site Allocations, and Historic Area Assessments and would be grateful if these links could be shared with the community:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

<https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/>

*Kind regards,
David*

David Stuart | Historic Places Adviser South West

Direct Line: 0117 975 0680 | Mobile: 0797 924 0316 Historic England | 29 Queen Square | Bristol | BS1 4ND
<https://historicengland.org.uk/southwest>

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Natural England

From: Routh, Charles (NE)
To: Way, David
Subject: RE: North Bradley Neighbourhood Plan and SEA screening decision. NE ref: 248929
Date: 11 June 2018 09:20:07

Dear David, I can confirm that Natural England concurs with the conclusion of the North Bradley Neighbourhood SEA screening decision, namely that the draft North Bradley Neighbourhood Plan is likely to have significant environmental effects and accordingly a Strategic Environmental Assessment is required.

Regards,

Charles Routh
Lead Advisor, Planning & Licencing, Somerset, Avon and Wiltshire Area Team, Natural England. 07990 773630

Environment Agency

From: Challans, Ellie
To: Way, David
Subject: RE: North Bradley Neighbourhood Plan (Wiltshire) SEA screening decision
Date: 15 June 2018 11:10:27

Dear David

On the understanding that all allocated sites will be in flood zone 1 or that any site partially in flood zone 2/3 will have no development within those zones, I can confirm that the Environment Agency would have no concerns as to the impact of the Plan.

However, I understand your justification for the need for a SEA, therefore we concur with your conclusion that a SEA is required.

Please consult us on the draft plan when this is ready.

Kind regards, Ellie

Ms Ellie Challans

Planning Advisor – Wessex Sustainable Places

02030 2 59311

Environment Agency, Rivers House, Sunrise Business Park, Higher Shaftesbury Road,
Blandford, Dorset, DT11 8ST

First HRA Screening (December 2018)

HRA of North Bradley Neighbourhood Development Plan SEA and HRA Screening Draft May 2018
LK/V2/12.12.18)

NORTH BRADLEY NEIGHBOURHOOD DEVELOPMENT PLAN HABITATS REGULATIONS ASSESSMENT (HRA)

1. Introduction

- 1.1. This version of the HRA relates to the North Bradley Neighbourhood Development Plan SEA and HRA Screening Draft dated September 2018.
- 1.2. The HRA has been carried out to comply with Regulation 105 of the Habitats Regulations 2017. Under these Regulations, a competent authority must consider whether a relevant plan is likely to have a significant effect on any European sites before deciding to give any consent, permission or other authorisation. If the screening exercise demonstrates significant effects are likely, whether or not these are addressed through mitigation measures¹, the competent authority must undertake an appropriate assessment to examine the effects of the plan on the conservation objectives of the European Sites in question, consult the appropriate nature conservation body and have regard to its representations. Both the screening and the full appropriate assessment, must consider the impacts of the plan alone and in combination with other plans or projects.
- 1.3. It is usually the case that a plan of this nature does not go into the detailed aspects of development proposals and therefore the full effects of potential development cannot be accurately assessed at the plan making stage. Those details will typically be identified through a planning application which would be subject to further, more detailed HRA. The principle that a HRA need only consider the effects of a proposal or policy in as much detail as is specified by the plan was explained by Advocate General Kokott in a judgement brought against the UK government in 2005:

"Many details are regularly not settled until the time of the final permission. It would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure."²

- 1.4. Where appropriate assessment is undertaken, the competent authority may only authorise the plan or project having ascertained, in light of the sites' conservation objectives, that it will not adversely affect the integrity of the European site or sites. Otherwise the plan cannot be authorised unless specific statutory tests are met.
- 1.5. Wiltshire Council has conducted the following HRA as competent authority for the North Bradley Neighbourhood Development Plan (NDP). Where risks to European Sites are identified, the plan must be amended e.g. by the incorporation of mitigation measures, to remove these before the plan is made. Likewise, if the policies or planning context change after the HRA is completed, the HRA process must be repeated before the final plan is considered by a referendum and adopted.

2. Screening Methodology

- 2.1. Each element of the plan has been categorised against screening criteria developed by Natural England to provide a clear audit trail for the screening assessment.
- 2.2. The screening criteria used are as follows:

¹ Court of Justice of the European Union, Case C 323/17 "People Over Wind"/P. Sweetman v Coillte Teoranta

² Commission of the European Communities v UK and NI, opinion of Advocate General KoKott, 9 June 2005, Case C-6/04

- Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development;
- Category A2: The policy is intended to protect the natural environment;
- Category A3: The policy is intended to conserve or enhance the natural, built or historic environment;
- Category A4: The policy would positively steer development away from European sites and associated sensitive areas;
- Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
- Category B – no significant effect;
- Category C – likely significant effect alone; and
- Category D – Likely significant effects in combination.

2.3. The effect of each policy has been considered both individually and in combination with other plans and projects (see table in section 4 below). Where potential for likely significant effects have been identified, an appropriate assessment is undertaken in section 5.

3. Higher Level HRAs

3.1 The Wiltshire Core Strategy HRA (October 2009, February 2012³, March 2013⁴, and April 2014⁵) identified general parameters to determine the likelihood of potential impact on Natura 2000 (European protected) sites. The following parameters were identified and assessed for the following Natura 2000 sites.

- *Recreation – Natura 2000 sites within 5km of the plan area, or where Salisbury Plain SPA/SAC is within 15km of the plan area:*
 - Salisbury Plain SAC and SPA
 - River Avon SAC
 - New Forest SAC / SPA
- *Hydrology / Hydrageology - Sites that fall wholly or partly within the Wessex Water Resource Zone may be susceptible to impact:*
 - Salisbury Plain SAC / SPA
 - Bath and Bradford on Avon Bats SAC
 - Pewsey Downs SAC
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - River Lambourn SAC
 - Kennet & Lambourn Floodplain SAC

³ Wiltshire Core Strategy Submission Draft – Assessment under the Habitats Regulations, Wiltshire Council, February 2012

⁴ Wiltshire Core Strategy – Assessment under the Habitats Regulations, Wiltshire Council, March 2013

⁵ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

HRA of North Bradley Neighbourhood Development Plan SEA and HRA Screening Draft May 2018 (K/V2/12.12.18)

- *Air Pollution / Nitrogen Deposition – Natura 2000 sites within 200m of a main road*
 - Porton Down SPA
 - Salisbury Plain SAC / SPA
 - Southampton Water SPA
 - Clattinger Farm SAC
 - River Avon SAC
 - Rodborough Common SAC
 - Cotswolds Beechwoods SAC
- *Physical Damage / Interruption of Flight Lines / Disturbance*
 - Bath and Bradford on Avon Bats SAC
 - Porton Down SPA

3.2 Since the Core Strategy was adopted, the Council has published a pre-submission draft of the Wiltshire Housing Site Allocations Plan together with a HRA dated 21 June 2017. A schedule of proposed changes was considered by Cabinet supported by an Addendum to the HRA dated May 2018. A final schedule of changes and an Addendum to the HRA incorporating minor factual changes were published in September 2018 for public consultation. The HRA screened the three allocations at Trowbridge which lie within the NDP area into appropriate assessment in relation to the Bath and Bradford on Avon Bat SAC. The assessment was concerned specifically with the potential for indirect effects of both recreational pressure and physical damage/interruption of flight lines/disturbance in areas which lie outside the SAC but which are functionally related to it. One of these allocations, Land of the A363 at White Horse Business Park, was also screened into appropriate assessment for Salisbury Plain SPA as it lies within a 6.4km radius of the Plain where the majority of its visitors are predicted to live.

4. Screening of Policies in North Bradley Neighbourhood Development Plan SEA and HRA Screening Draft May 2018

- 4.1 The North Bradley Neighbourhood Development Plan comprises 7 planning policies.
- 4.2 The two European Sites where there is a mechanism for effect from this NDP is the Bath and Bradford on Avon Bats SAC and Salisbury Plain SPA. All parts of the draft plan have been screened for potential impacts on these sites. Five policies have the potential to give rise to significant effects and are therefore taken forward to appropriate assessment in section 5 below.
- 4.3 Other policies would either not lead directly to development or would have no significant effects due to the scale and nature of the proposals in the plan.

TABLE: Habitats Regulations Assessment Screening of the North Bradley Neighbourhood Development Plan

A / B (Green) – Screened out
 C / D (Red) – Screened in

Policy	Initial screening category	Issue	Screening category after changes recommended by appropriate assessment
Policy 1: Landscape Setting and HSAP Housing Sites	C and D for Bats SAC D for Salisbury Plain SPA	One of the HSAP housing allocations (2.2: Land off the A363 at White Horse Business Park), lies within zones where impacts may lead to likely significant effects on the Bath and Bradford on Avon Bats SAC and the Salisbury Plain SPA. The NDP policy seeks to modify this HSAP allocation by identifying specific locations for housing in order to preserve a landscape gap. As such the NDP cannot rely on the appropriate assessment for the HSAP and this policy should be considered through an appropriate assessment for the NDP in relation to both European sites.	
Policy 2: Housing - General	D for Bat SAC D for Salisbury Plain SPA	This policy proposes that windfall developments should be permitted where they meet specific criteria. By identifying that such development should be located within the settlement boundary, impacts to bat habitat will be minimised. Nevertheless, it will contribute to in-combination effects of recreational pressure on the Bath and Bradford on Avon Bats SAC and the Salisbury Plain SPA and this policy should therefore be considered through appropriate assessment.	
Policy 3: Housing NDP Sites	C and D for Bats SAC D for Salisbury Plain SPA	2 sites are allocated by the NDP: Park Farm and 5A Woodmarsh which together would contribute in the order of 60 dwellings on greenfield sites. The effects of these alone and in combination with other development should be considered through an appropriate assessment for the NDP in relation to both European sites.	
Policy 4: Local Green Space	D for bats SAC	4 sites are proposed for designation as local green space. One of these, Trowbridge Town FC Football Field, lies outside the North Bradley settlement area. While there are no specific proposals in the plan to enhance these sites for recreation, the policy gives scope for recreational enhancements which could give	

Policy	Initial screening Category	Issue	Screening category after changes recommended by appropriate assessment
Policy 5: Bat Conservation Policy	A1 and A2	This policy seeks to avoid harm to bats and their habitat and as such does not lead to significant effects. However in not mentioning the TBMS, it is not adequate to overcome the issues identified in policies 1, 2, 3 and 4 above. It is essentially duplicating Core Policy 50 in the WCS.	
Policy 6: Developer Contributions Policy	C and D for Bats SAC	The provision of new and upgraded foot / cycle paths and crossing points could lead to impacts on the Bath and Bradford on Avon SAC alone if lighting adversely affects habitats used by SAC bat species for foraging, commuting or roosting. Effects could also occur in-combination with other schemes. This policy should therefore be considered through an appropriate assessment.	
Policy 7: Parish Burial Ground	A2	A new burial ground is a land use which is compatible with maintaining the Bath and Bradford on Avon Bats SAC. Design details would be considered at planning application stage	

5. Appropriate Assessment – Bath and Bradford on Avon Bats SAC

Background to the Bath and Bradford on Avon SAC

- 5.1 The following account clarifies the key geographical and ecological relationships between the Bath and Bradford on Avon Bats SAC and the North Bradley NDP area, as far as these are currently known. Details of the conservation objectives are available online. The current version is dated 30 June 2014.
- 5.2 The SAC designation extends across former stone mines which are hibernation and swarming sites for the three species of bat which are features of this SAC; great and lesser horseshoe and Bechstein's bats. The nearest mine is at Winsley approximately 8km from North Bradley. Others occur near Box and Bath. The mines are mainly used by bats during the winter and autumn.
- 5.3 While the SAC lies some distance from North Bradley, the bats roost and feed across a much wider area during the spring and summer. Horseshoe bats generally breed in buildings while a significant breeding colony of Bechstein's bats occurs in woodlands to the south of Trowbridge. The Council has prepared guidance to demonstrate how development across the whole bat landscape must take account of the SAC⁶. It identifies a number of core roosts with core areas around them (termed "consultation zones") to show where bat activity is likely to be concentrated and where particular precautions will be required.
- 5.4 Green Lane and Biss Woods, and Picket and Clanger Woods are all core roosts for Bechstein's bats and the core areas around them extend across the majority of the North Bradley NDP area. This species cannot be identified from bat detectors but there are several records for Bechstein's in the NDP area resulting from radio-tracking studies.
- 5.5 There are several reported horseshoe bat roosts in the NDP area including one at St Nicholas's church in North Bradley. The core area for a greater horseshoe core roost in Westbury extends into the southern part of the NDP area. Both horseshoe species are known to use the area for foraging and it is likely all three species fly through open countryside in the NDP area to access the SAC.
- 5.6 The forthcoming Trowbridge Bat Mitigation Strategy will take the bat SAC guidelines further in relation to potential future housing in Trowbridge and villages to the south by identifying bat sensitivity zones and specific mitigation criteria.

Plans and Projects to be considered in-combination

- 5.7 The screening Assessment found that the North Bradley NDP could lead to significant effects on the Bath and Bradford on Avon Bats SAC in combination with other plans and projects. The following assessment has been conducted taking the following plans and projects into consideration:
- Wiltshire Core Strategy (Adopted January 2015)
 - Wiltshire Housing Site Allocations Plan submission document May 2018 with proposed schedule of changes dated September 2018
 - Application 15/04736/OUT Ashton Park, Trowbridge
 - Application 16/04468/OUT land South West of Ashton Road, Trowbridge

⁶ Bat Special Areas of Conservation, planning guidance for Wiltshire. Issue 3.0, 10 September 2015

HRA of North Bradley Neighbourhood Development Plan SEA and HRA Screening Draft May 2018
(K/V2/12.12.18)

- Application 16/00547/FUL Land SE of Southview Park, Trowbridge
- Application 17/12509/FUL Land SE of Southview Park, Trowbridge
- Application 18/00985/OUT The Grange, Hilperton
- Application 16/00672/OUT Land W of Elizabeth Way, SW of Hilperton Marsh, Trowbridge
- Application 17/09961/OUT Land West Of Biss Farm, West Ashton Road, Trowbridge
- Permission 13/06879/OUT Land South of Devizes Road, Hilperton
- Permission W/11/01932/REM Land North East of Green Lane Farm, Trowbridge (completed)
- Permission W/04/02105/OUTES Land adjacent to scrapyard, Trowbridge (completed)
- Application 18/02671/FUL Sunnyside Yarnbrook Road

HRA for the Wiltshire Housing Site Allocations Plan pre-submission draft

- 5.8 The HRA for the Wiltshire Housing Site Allocations Plan pre-submission draft included an appropriate assessment of the six allocations proposed for Trowbridge and this has now been supplemented by an Addendum HRA (September 2018).
- 5.9 The HRA and its addendum concluded that allocations would not lead to an adverse effect on site integrity alone or in-combination with other plans and projects provided that:
- Sensitive habitat features on / adjacent to allocation sites are retained and buffered from development (including residential gardens) by wide, dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by SAC bats ;
 - Development delivers new habitats to offset in-combination habitat losses due to the effect of ongoing urbanisation at a landscape scale, and;
 - Development delivers measures to offset in-combination increases in recreational pressure which are likely to occur at publicly accessible woodlands used by breeding Bechstein's bats.
- 5.10 Mitigation criteria for retaining and buffering habitat within green field sites will be detailed in the Trowbridge Bat Mitigation Strategy (TBMS) which the Council is preparing in consultation with Natural England and is well advanced. The Strategy will also detail specific mitigation measures to address in-combination effects and these will be secured with appropriate developer contributions and implemented through a scheme run by the Council.
- 5.11 The TBMS is being supported by a study investigating recreational use of publicly accessible open spaces including the woodlands south of Trowbridge used by roosting Bechstein's bats. The findings suggest that residents from North Bradley are more inclined to visit Picket and Clanger Woods and Southwick Country Park as opposed to Green Lane and Biss Woods. This is to be expected as the former sites are closer to North Bradley. The evidence suggests people drive to these sites and it is notable that Picket and Clanger Woods draw visitors from a greater distance than Southwick Country Park.

Analysis of policies in the NDP screened into appropriate assessment

Policy 1 Landscape Setting and HSAP Housing Sites

- 5.12 This policy lends unqualified support for HSAP allocations for Elm Grove (H2.1) and Southwick Court (H2.6). These two allocations are being considered under the appropriate assessment for the HSAP and need not be considered further here.
- 5.13 Policy 1 also supports the allocation in the HSAP for Land off the A363 at White Horse Business Park (H2.2) provided it is reduced from 225 to 175 dwellings and this reduction has been incorporated into the Council's published Schedule of Proposed Changes. In addition Policy 1 requires development to follow the layout set out in the Landscape Policy Map accompanying the policy and requires there should be no

development in the North Bradley Landscape Protection Area. Assuming this allocation is acceptable under the appropriate assessment for the HSAP, the question for the appropriate assessment of this NDP is whether the layout constraint imposed by the NDP could in itself lead to adverse effects.

- 5.14 Evidence from ad-hoc records indicates that North Bradley NDP area is of importance to the SAC features. In relation to Bechstein's, it appears this is due to the NDP area being located between the large breeding roosts south of Trowbridge / Westbury and the hibernation sites east of Bath. For greater and lesser horseshoes the attraction is likely to be the availability of suitable buildings within a pastoral setting. The records suggest that key habitats for all three species are likely to be the River Biss corridor, railway corridor and the network of small grazed fields / hedgerow boundaries, but no systematic survey has been completed. Such a survey would be impractical on the basis of cost and unfeasible for Bechstein's due to the limitation of current survey techniques which cannot distinguish this species on bat detectors.
- 5.15 Preliminary work for the TBMS identified that loss of habitat within several hundred metres of breeding woodlands had a high risk of causing negative impacts on Bechstein's. Land allocated at White Horse Business Park ("the gap") lies outside this zone but it falls within a zone of moderate risk where land take will require significant mitigation. Having identified "the gap" as being available and appropriate for development, Wiltshire Council sought to ensure it would be suitable for development by constraining housing quantum / footprint to ensure a sizeable proportion of open land would be retained and enhanced for bat mitigation. A precautionary approach was taken, as required by the Habitats Regulations. By allocating the site for 175 dwellings, the Council was able to demonstrate, beyond reasonable scientific doubt, that the allocation would not adversely affect the SAC.
- 5.16 Close examination of "the gap" shows that potential for habitat use by bats is as follows:
- Pasture and field hedgerows, particularly around Little Common Farm / Willow Grove, Kings Farm / Kings Folly and at the northern end of the allocation – potential for foraging by all three species, commuting by greater horseshoes and Bechstein's
 - Tree belt along western edge of White Horse Business Park – potential for foraging and commuting by all three species
 - Individual trees with existing holes etc (survey required to determine whether any currently exist in the allocation) – potential for night and day roosting by Bechstein's, possibility of small maternity roosts (Bechstein's)
 - Individual trees without holes etc – potential for future night and day roosting by Bechstein's, small maternity roosts of Bechstein's
- 5.17 The Landscape Policy Map aims to identify land which would be suitable for housing. It includes buffers for hedgerows and trees but does not allocate land for drainage and open space. The remainder of "the gap" is designated as North Bradley Landscape Protection Area.
- 5.18 On the basis of 30 units per hectare, it appears this layout would be able to accommodate the 175 units allocated in the HSAP. It would lead to loss of pasture land, fragmentation of hedgerows, deterioration of the remaining hedgerows due to light spill and loss of trees due to amenity / health and safety issues. However, in principle, I consider that the scale and nature of these losses is consistent with that anticipated for the HSAP and could be mitigated within the undeveloped Landscape Protection Area. Importantly the layout maintains a continuous wide corridor of habitat running the full length of the allocation from north-west to south-east which would help to maintain habitat connectivity between core roosts. Drainage lagoons and open space, provided these did not include any lighting, would be compatible with bat mitigation measures located within "the gap".

- 5.19 I note that, until detailed surveys of trees are undertaken, it remains unclear whether any existing Bechstein's maternity roosts are present on site. My presumption is that such a roost would have to be retained within a buffer of habitat and as such it is very unlikely it could be integrated within the development site. However, I believe the risk of a maternity roost this far from the main breeding woodlands is low. There is a greater risk of surveys identifying horseshoe roosts in buildings either within or outside the allocation boundary however I consider the layout is generally robust to this possibility.
- 5.20 As a result of street lighting on the A363 and Woodmarsh/Westbury Road which together completely encircle the allocation, there is no obvious dark route of entry for bats. Concentrations of lighting columns at roundabouts on the A363 and A350 may be influential in directing bat flight lines. In view of this and radio-tracking studies conducted for Ashton Park, it is possible that bats approaching from the east will be more likely to cross the A350 east of Yarnbrook and then the A363 just north of Meridan Park where an area of land in the White Horse Business Park remains undeveloped. The Landscape Policy Map would accommodate this scenario but bat flightlines from the south would be more constrained.
- 5.21 While other layouts could accommodate the proposed quantum of housing, this will be one of the few options which allocates sufficient land for mitigation, preserves the most valuable habitats and their connectivity within the site, and maintains habitat networks beyond the allocation boundary.

Recommendation for Policy 1: Landscape Setting and HSAP Housing Sites. The policy does not give rise to adverse effects. No changes are required to wording of the policy or supporting text.

Policy 2 Housing - General

- 5.22 Residential development at North Bradley has the potential to lead to increased recreational use of the publically accessible woodlands containing core bats roosts, i.e. Pickett and Clanger Woods, Green Lane and Biss Woods. Recent development at Castlemead demonstrates recreational pressure could be having an adverse impact on this sensitive species and while recreational pressure from any single development is unlikely to trigger effects, there is a significant risk that the combined pressure from proposed development around Trowbridge would cause a gradual reduction in both breeding success and use of the woodlands by this bat species.
- 5.23 Few residents will be expected to visit the woodlands on foot due to the distance, most will park at Green Lane Wood and Pickett and Clanger Wood. Such parking is limited but understood to not yet be at full capacity. Windfall development can therefore be expected to make a small contribution to recreational impacts in-combination with other allocations and windfall development. The TBMS which is being prepared to support the HSAP will provide a mechanism to mitigate these impacts through CIL contributions. It is therefore more appropriate for the appropriate assessment of the HSAP to consider this aspect of the NDP. However I advise that the supporting text needs to explain the relevance of the TBMS and note that all development in the Trowbridge area must comply with the requirements of that document.

Recommendation for Policy 2: Housing – General. The following text should be inserted within the supporting text for this policy:

"All new housing in the NDP area will lead to recreational impacts on core bat roosts in woodlands to the south of Trowbridge in combination with other developments. Developer contributions will therefore be used to provide mitigation measures as set out in the Trowbridge Bat Mitigation Strategy. While it is not anticipated that housing coming forward within the settlement boundary will impact on habitat used by bat species which are features of the Bath and Bradford on Avon Bats SAC, where this

is necessarily the case, development will be expected to comply with the approach outlined in the Trowbridge Bat Mitigation Strategy."

Policy 3 – Housing NDP Sites

- 5.24 Park farm is allocated outside the settlement boundary for an indicative number of 35 dwellings and 54 Woodmarsh is allocated for an indicative number of 25 dwellings. These allocations will lead to loss of bat habitat and recreational impacts on the woodlands used by breeding Bechstein's.
- 5.25 The TBMS recognises that greenfield sites will come forward as part of neighbourhood plans in addition to the 6 sites allocated for Trowbridge. The same approach will be used to ensure that neighbourhood plan allocations deliver the necessary on site and off site mitigation:
- a) Sensitive habitat features on / adjacent to allocation sites will be retained and buffered from development (including residential gardens) by wide, dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by SAC bats;
 - b) Development will deliver new habitats to offset in-combination habitat losses due to the effect of ongoing urbanisation at a landscape scale, and;
 - c) Development will deliver measures to offset in-combination increases in recreational pressure which are likely to occur at publicly accessible woodlands used by breeding Bechstein's bats
- 5.26 While b) and c) are expected to be delivered through CIL, it is expected that a) will be achieved through on site measures and this will considerably reduce the housing capacity of allocation sites. In this context, I note that while the capacity of Park Farm seems realistic, the quantum projected for 54 Woodmarsh may not be achievable if it is to meet the requirements of a) above. If this is the case, additional land off site must be identified for mitigation.
- 5.27 It is expected that the NDP allocations will need to be designed in full compliance with the guidance contained in the TBMS for both habitat and recreational impacts. As the TBMS will exercise significant control over designs coming forward, I recommend that policy wording is amended to draw attention to this matter.

Recommendation for Policy 3: Housing NDP Sites.

Park Farm SHELAA 322, replace specific point (v) with:

"In view of the risks this development presents to the SAC, this development will be expected to be surveyed, designed and mitigated in full accordance with the Trowbridge Bat Mitigation Strategy. Full mitigation for loss of habitats must be achieved within the application boundary."

54 Woodmarsh SHELAA 1040, replace specific point (iv) with:

"In view of the risks this development presents to the SAC, this development will be expected to be surveyed, designed and mitigated in full accordance with the Trowbridge Bat Mitigation Strategy. Full mitigation for loss of habitats must be achieved within the application boundary."

Policy 4 Local Green Space

- 5.28 Trowbridge football field is located immediately adjacent to the settlement boundary on the south side of Trowbridge. From aerial photographs most of the field is closely mown pitches and it is enclosed on all four sides by farmland hedgerows. It lies within a corridor of green fields on the south side of Trowbridge which are presumed, on a precautionary basis, to be of significance for those bat species which are features of the SAC. It is also adjacent to HSAP allocations for Elm Grove Farm and White Horse Business Park 2.
- 5.29 Policy 4 allows for "...extension or enhancement of the existing recreational facilities for the recreational benefit of the community..." The main concern from a bat perspective would be installation of lighting, especially floodlighting this has the potential to lead to impacts alone and in-combination with other development. There are no specific proposals in the plan but anticipating that new housing will lead to more intensive use of sports facilities, an application for flood lighting is not unlikely. Applications would be tested under the Habitats Regulations and potentially refused if it could not be demonstrated there would be no adverse effects on the integrity of the SAC. The TBMS provides detailed guidance on surveys and mitigation which will be expected from lighting proposals in the Trowbridge area and reference should be made to this in the supporting text. It should be noted however, that it by no means certain that floodlighting would be acceptable, despite mitigation, at the football field location.

Recommendation for Policy 4: Local Green Space. The option exists to add wording to the supporting text to ensure this guidance is followed before an application is submitted. However as the list of local priorities for developer contributions contained in Policy 6 raises the same types of issues, I consider it would be simpler to deal with by inserting wording into the supporting text of Policy 5 below.

Policy 5 Bat Conservation Policy

- 5.30 This policy is not screened into appropriate assessment. However I have recommended wording for inclusion in the supporting text to deal with potential effects arising as a result of policies 4 and 6. Both of these policies can be expected to be widely supported as they provide for community facilities and better access. This broad support may however mean their potential to adversely affect bats is overlooked and this presents a risk for the SAC.
- 5.31 I have also recommended new wording for the policy itself as it does not reflect the new requirements of the TBMS which effectively updates CPSO in respect of Trowbridge and the Bath and Bradford on Avon Bats SAC.

Recommendation for Policy 5: Bat Conservation Policy.

Policy wording - I recommend this is replaced with the following:

"The entire NDP 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. Development is unlikely to be permitted in areas identified as being of high sensitivity for bats."

Supporting text - I recommend the following wording is added (perhaps as para 8.51):

"Schemes to improve public facilities and access routes may also lead to impacts on bats, especially where these lead to increased lighting, such as floodlighting of sports pitches, or changes to the extent or management of hedgerows e.g. for improvements to footpaths and cycleways. Any such proposals should consider the guidance contained in the Trowbridge Bat Mitigation Strategy and planning applications will need to demonstrate there will be no adverse effect on bats from the application alone and in-combination with other development. Poorly sited developments may be refused but carefully

designed schemes making use of modern lighting techniques and equipment as illustrated in the above strategy, may bring improvements on sustainable transport routes for both people and bats."

Conclusion for the Bath and Bradford on Avon Bats SAC

- 5.32 Provided that the recommendations above are incorporated into the NDP, I consider that it is possible to conclude, beyond reasonable scientific doubt, that there would be no adverse effects on the Bath and Bradford on Avon Bats SAC, alone or in- combination with other plans and projects.

6 Appropriate Assessment – Salisbury Plain SPA

Background to the Salisbury Plain SPA

- 6.1 Salisbury Plain SPA encompasses a plateau of chalk grassland, which supports the following SPA features: breeding common quail, Eurasian hobby, stone-curlew and non-breeding hen harrier. Details of the conservation objectives are available online. The current version is dated 30 June 2014.
- 6.2 Evidence from research has demonstrated that stone-curlew is particularly susceptible to recreational pressure and the Council has recognised this in the HRA for Wiltshire Council Core Strategy which was supported by a strategic HRA for housing development⁷. This has been updated to support the HSAP⁸ and these documents should be referred to for the background details for this European site.
- 6.3 In consultation with Natural England, the other features are not considered to be vulnerable to recreational pressure.

Plans and projects to be considered in combination

- 6.1 The screening Assessment found that the North Bradley NDP would not lead to significant effects on the Salisbury Plain SPA alone. Impacts would only occur in combination with other plans and projects. The following plans and projects have been taken into consideration:
- Wiltshire Core Strategy (Adopted January 2015)
 - Wiltshire Housing Site Allocations Plan submission document May 2018 with proposed schedule of changes dated September 2018
 - Army basing Programme delivering 917 dwellings at 4 sites in close proximity to the Plain

HRA for the Wiltshire Housing Site Allocations Plan pre-submission draft

- 6.4 Evidence from a visitor survey commissioned by the Council in 2015 demonstrated that 75% of visitors accessing the plain lived within 6.4km of the SPA boundary and 1% of the population within that distance would be expected to visit on a regular basis. Using these findings the HSAP HRA calculated that the housing sites plan would increase visitor numbers to the Plain by 1% over the estimates calculated for the Core Strategy. This figure incorporated a number of precautionary assumptions to counteract any constraints of the data used. Taking the favourable condition of the SPA into consideration, it was considered that existing mitigation measures in place for the Core Strategy would continue to provide an effective, timely and reliable means of mitigating any additional effects from the HSAP should they arise.

⁷ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreational pressure from redevelopment), Wiltshire Council, 30 March 2012

⁸ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreational pressure from residential development), Wiltshire Council, reviewed in May 2018

Analysis of policies in the NDP screened into appropriate assessment

Policy 1 Landscape Setting and HSAP Housing Sites

- 6.5 As for the Bats SAC, the only matter for the current assessment is whether the proposed layout in policy 1 could contribute to adverse effects Salisbury Plain SPA.
- 6.6 The White Horse Business Park allocation lies just inside the 6.4km radius where housing numbers are assumed to contribute to recreational pressure. Although a small part of the allocation lies outside this limit, this is insufficient in area to accommodate the 175 dwellings being allocated. In any case the 6.4km is a tool for estimation purposes and does not represent a precise boundary where impacts will or will not occur. The distribution of housing resulting from Policy 1 is likely to be no worse or better in terms of the number of recreational visits it generates to the Plain than any other layout proposed for the allocation.

Recommendation for Policy 1: Landscape Setting and HSAP Housing Sites. The policy does not give rise to adverse effects. No changes are required to wording of the policy or supporting text.

Policy 2 Housing - General

- 6.7 This policy places constraints on windfall development but does not propose development in itself. In view of the mitigation measures currently in place for the Core Strategy, which were retested for the HSAP and found to meet the requirements of the Habitats Regulations, I do not consider that this policy would lead to adverse effects.

Recommendation for Policy 2: Housing - General. The policy does not give rise to adverse effects. No changes are required to wording of the policy or supporting text.

Policy 3 – Housing NDP Sites

- 6.8 A further 60 dwellings are allocated through this policy, Park Farm lies 6.3km from the SPA and 54 Woodmarsh lies 6km away. Sixty dwellings will give rise to 136 people, 1% of which can be expected to visit the Plain on a regular basis. This scale of visitor pressure would not contribute significantly to pressures on the Plain and is readily covered by the mitigation approach taken adopted for the Core Strategy and the HSAP.

Recommendation for Policy 3: Housing NDP Sites. The policy does not give rise to adverse effects. No changes are required to wording of the policy or supporting text.

Conclusion for the Salisbury Plain SPA

- 6.9 I consider that no changes are required to the NDP in order to conclude, beyond reasonable scientific doubt, that there would be no adverse effects on the Salisbury Plain SPA, alone or in- combination with other plans and projects.

Second HRA Screening (January 2019 – Received March 2019)

HRA of North Bradley Neighbourhood Development Plan Regulation 14 Consultation Draft January 2019 LK/V3/15.03.19)

NORTH BRADLEY NEIGHBOURHOOD DEVELOPMENT PLAN HABITATS REGULATIONS ASSESSMENT (HRA)

1. Introduction

- 1.1. This version of the HRA relates to the North Bradley Neighbourhood Development Plan Regulation 14 Consultation Draft January 2019.
- 1.2. The HRA has been carried out to comply with Regulation 105 of the Habitats Regulations 2017. Under these Regulations, a competent authority must consider whether a relevant plan is likely to have a significant effect on any European sites before deciding to give any consent, permission or other authorisation. If the screening exercise demonstrates significant effects are likely, whether or not these are addressed through mitigation measures¹, the competent authority must undertake an appropriate assessment to examine the effects of the plan on the conservation objectives of the European Sites in question, consult the appropriate nature conservation body and have regard to its representations. Both the screening and the full appropriate assessment, must consider the impacts of the plan alone and in combination with other plans or projects.
- 1.3. It is usually the case that a plan of this nature does not go into the detailed aspects of development proposals and therefore the full effects of potential development cannot be accurately assessed at the plan making stage. Those details will typically be identified through a planning application which would be subject to further, more detailed HRA. The principle that a HRA need only consider the effects of a proposal or policy in as much detail as is specified by the plan was explained by Advocate General Kokott in a judgement brought against the UK government in 2005:
*"Many details are regularly not settled until the time of the final permission. It would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure."*²
- 1.4. Where appropriate assessment is undertaken, the competent authority may only authorise the plan or project having ascertained, in light of the sites' conservation objectives, that it will not adversely affect the integrity of the European site or sites. Otherwise the plan cannot be authorised unless specific statutory tests are met.
- 1.5. Wiltshire Council has conducted the following HRA as competent authority for the North Bradley Neighbourhood Development Plan (NDP). Where risks to European Sites are identified, the plan must be amended e.g. by the incorporation of mitigation measures, to remove these before the plan is made. Likewise, if the policies or planning context change after the HRA is

¹ Court of Justice of the European Union, Case C 323/17 "People Over Wind"/P. Sweetman v Coillte Teoranta

² Commission of the European Communities v UK and NI, opinion of Advocate General Kokott, 9 June 2005, Case C-6/04

HRA of North Bradley Neighbourhood Development Plan Regulation 14 Consultation Draft January 2019 (LK/V3/15.03.19)

- *Hydrology / Hydrogeology - Sites that fall wholly or partly within the Wessex Water Resource Zone may be susceptible to impact:*
 - Salisbury Plain SAC / SPA
 - Bath and Bradford on Avon Bats SAC
 - Pewsey Downs SAC
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - River Lambourn SAC
 - Kennet & Lambourn Floodplain SAC
- *Air Pollution / Nitrogen Deposition – Natura 2000 sites within 200m of a main road*
 - Porton Down SPA
 - Salisbury Plain SAC / SPA
 - Southampton Water SPA
 - Clattinger Farm SAC
 - River Avon SAC
 - Rodborough Common SAC
 - Cotswolds Beechwoods SAC
- *Physical Damage / Interruption of Flight Lines / Disturbance*
 - Bath and Bradford on Avon Bats SAC
 - Porton Down SPA

3.2 Since the Core Strategy was adopted, the Council has published a pre-submission draft of the Wiltshire Housing Site Allocations Plan together with a HRA dated 21 June 2017. A schedule of proposed changes was considered by Cabinet supported by an Addendum to the HRA dated May 2018. A final schedule of changes and an Addendum to the HRA incorporating minor factual changes were published in September 2018 for public consultation. The HRA screened the three allocations at Trowbridge which lie within the NDP area into appropriate assessment in relation to the Bath and Bradford on Avon Bat SAC. The assessment was concerned specifically with the potential for indirect effects of both recreational pressure and physical damage/interruption of flight lines/disturbance in areas which lie outside the SAC but which are functionally related to it. One of these allocations, Land of the A363 at White Horse Business Park, was also screened into appropriate assessment for Salisbury Plain SPA as it lies within a 6.4km radius of the Plain where the majority of its visitors are predicted to live.

4. Screening of Policies in North Bradley Neighbourhood Development Plan SEA and HRA Screening Draft May 2018

4.1 The North Bradley Neighbourhood Development Plan comprises 7 planning policies.

HRA of North Bradley Neighbourhood Development Plan Regulation 14 Consultation Draft January 2019 (LK/V3/15.03.19)

completed, the HRA process must be repeated before the final plan is considered by a referendum and adopted.

2. Screening Methodology

2.1. Each element of the plan has been categorised against screening criteria developed by Natural England to provide a clear audit trail for the screening assessment.

2.2. The screening criteria used are as follows:

- Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development;
- Category A2: The policy is intended to protect the natural environment;
- Category A3: The policy is intended to conserve or enhance the natural, built or historic environment;
- Category A4: The policy would positively steer development away from European sites and associated sensitive areas;
- Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
- Category B – no significant effect;
- Category C – likely significant effect alone; and
- Category D – Likely significant effects in combination.

2.3. The effect of each policy has been considered both individually and in combination with other plans and projects (see table in section 4 below). Where potential for likely significant effects have been identified, an appropriate assessment is undertaken in section 5.

3. Higher Level HRAs

3.1 The Wiltshire Core Strategy HRA (October 2009, February 2012³, March 2013⁴, and April 2014⁵) identified general parameters to determine the likelihood of potential impact on Natura 2000 (European protected) sites. The following parameters were identified and assessed for the following Natura 2000 sites.

- *Recreation – Natura 2000 sites within 5km of the plan area, or where Salisbury Plain SPA/SAC is within 15km of the plan area:*
 - Salisbury Plain SAC and SPA
 - River Avon SAC
 - New Forest SAC / SPA

³ Wiltshire Core Strategy Submission Draft – Assessment under the Habitats Regulations, Wiltshire Council, February 2012

⁴ Wiltshire Core Strategy – Assessment under the Habitats Regulations, Wiltshire Council, March 2013

⁵ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

HRA of North Bradley Neighbourhood Development Plan Regulation 14 Consultation Draft January 2019 (LK/V3/15.03.19)

- 4.2 The two European Sites where there is a mechanism for effect from this NDP is the Bath and Bradford on Avon Bats SAC and Salisbury Plain SPA. All parts of the draft plan have been screened for potential impacts on these sites. Five policies have the potential to give rise to significant effects and are therefore taken forward to appropriate assessment in section 5 below.
- 4.3 Other policies would either not lead directly to development or would have no significant effects due to the scale and nature of the proposals in the plan.

TABLE: Habitats Regulations Assessment Screening of the North Bradley Neighbourhood Development Plan

A / B (Green) – Screened out		
C / D (Red) – Screened in		
Policy	Initial screening Category	Issue
Policy 1: Landscape Setting and HSAP Housing Sites	C and D for Bats SAC D for Salisbury Plain SPA	One of the HSAP housing allocations (2.2: Land off the A363 at White Horse Business Park), lies within zones where impacts may lead to likely significant effects on the Bath and Bradford on Avon Bats SAC and the Salisbury Plain SPA. The NDP policy seeks to modify this HSAP allocation by identifying specific locations for housing in order to preserve a landscape gap. As such the NDP cannot rely on the appropriate assessment for the HSAP and this policy should be considered through an appropriate assessment for the NDP in relation to both European sites.
Policy 2: Housing - General	D for Bat SAC D for Salisbury Plain SPA	This policy proposes that windfall developments should be permitted where they meet specific criteria. By identifying that such development should be located within the settlement boundary, impacts to bat habitat will be minimised. Nevertheless, it will contribute to in-combination effects of recreational pressure on the Bath and Bradford on Avon Bats SAC and the Salisbury Plain SPA and this policy should therefore be considered through appropriate assessment.
Policy 3: Housing NDP Sites	C and D for Bats SAC D for Salisbury Plain SPA	2 sites are allocated by the NDP: Park Farm and 54 Woodmarsh which together would contribute in the order of 60 dwellings on greenfield sites. The effects of these alone and in combination with other development should be considered through an appropriate assessment for the NDP in relation to both European sites.
Policy 4: Local Green Space	D for bats SAC	4 sites are proposed for designation as local green space. One of these, Trowbridge Town FC football Field, lies outside the North Bradley settlement area. While there are no specific proposals in the plan to enhance these sites for recreation, the policy gives scope for recreational enhancements which could give rise to in-combination effects on the Bath and Bradford on Avon Bats SAC. This policy should therefore be considered through an appropriate assessment.
Policy 5: Bat Conservation Policy	A1 and A2	The policy and supporting text emphasises the need for development to comply with the Trowbridge Bat Mitigation Strategy. None compliance application are unlikely to be permitted.
Policy 6: Developer Contributions Policy	C and D for Bats SAC	The provision of new and upgraded foot / cycle paths and crossing points could lead to impacts on the Bath and Bradford on Avon SAC alone if lighting adversely affects habitats used by SAC bat species for foraging, commuting or roosting. Effects could also occur in-combination with other schemes. This policy should therefore be considered through an appropriate assessment.
Policy 7: Parish Burial Ground	A2	A new burial ground is a land use which is compatible with maintaining the Bath and Bradford on Avon Bats SAC. Design details would be considered at planning application stage

5. Appropriate Assessment – Bath and Bradford on Avon Bats SAC

Background to the Bath and Bradford on Avon SAC

- 5.1 The following account clarifies the key geographical and ecological relationships between the Bath and Bradford on Avon Bats SAC and the North Bradley NDP area, as far as these are currently known. Details of the conservation objectives are available online. The current version is dated 30 June 2014.
- 5.2 The SAC designation extends across former stone mines which are hibernation and swarming sites for the three species of bat which are features of this SAC; great and lesser horseshoe and Bechstein's bats. The nearest mine is at Winsley approximately 8km from North Bradley. Others occur near Box and Bath. The mines are mainly used by bats during the winter and autumn.
- 5.3 While the SAC lies some distance from North Bradley, the bats roost and feed across a much wider area during the spring and summer. Horseshoe bats generally breed in buildings while a significant breeding colony of Bechstein's bats occurs in woodlands to the south of Trowbridge. The Council has prepared guidance to demonstrate how development across the whole bat landscape must take account of the SAC⁶. It identifies a number of core roosts with core areas around them (termed "consultation zones") to show where bat activity is likely to be concentrated and where particular precautions will be required.
- 5.4 Green Lane and Biss Woods, and Picket and Clanger Woods are all core roosts for Bechstein's bats and the core areas around them extend across the majority of the North Bradley NDP area. This species cannot be identified from bat detectors but there are several records for Bechstein's in the NDP area resulting from radio-tracking studies.
- 5.5 There are several reported horseshoe bat roosts in the NDP area including one at St Nicholas's church in North Bradley. The core area for a greater horseshoe core roost in Westbury extends into the southern part of the NDP area. Both horseshoe species are known to use the area for foraging and it is likely all three species fly through open countryside in the NDP area to access the SAC.
- 5.6 The forthcoming Trowbridge Bat Mitigation Strategy will take the bat SAC guidelines further in relation to potential future housing in Trowbridge and villages to the south by identifying bat sensitivity zones and specific mitigation criteria.

Plans and Projects to be considered in-combination

- 5.7 The screening Assessment found that the North Bradley NDP could lead to significant effects on the Bath and Bradford on Avon Bats SAC in combination with other plans and projects. The following assessment has been conducted taking the following plans and projects into consideration:
 - Wiltshire Core Strategy (Adopted January 2015)
 - Wiltshire Housing Site Allocations Plan submission document May 2018 with proposed schedule of changes dated September 2018
 - Application 15/04736/OUT Ashton Park, Trowbridge

⁶ Bat Special Areas of Conservation, planning guidance for Wiltshire. Issue 3.0, 10 September 2015

HRA of North Bradley Neighbourhood Development Plan Regulation 14 Consultation Draft January 2019 (LK/V3/15.03.19)

- Application 16/04468/OUT land South West of Ashton Road, Trowbridge
- Application 16/00547/FUL Land SE of Southview Park, Trowbridge
- Application 17/12509/FUL Land SE of Southview Park, Trowbridge
- Application 18/00985/OUT The Grange, Hilperton
- Application 16/00672/OUT Land W of Elizabeth Way, SW of Hilperton Marsh, Trowbridge
- Application 17/09961/OUT Land West Of Biss Farm, West Ashton Road, Trowbridge
- Permission 13/06879/OUT Land South of Devizes Road, Hilperton
- Permission W/11/01932/REM Land North East of Green Lane Farm, Trowbridge (completed)
- Permission W/04/02105/OUTES Land adjacent to scrapyard, Trowbridge (completed)
- Application 18/02671/FUL Sunnyside Yarnbrook Road
- Corsham Neighbourhood Development plan 2016-2026 Submission Draft February 2018
- Southwick Neighbourhood Plan 2018-2026 Screening Draft August 2018
- West Ashton Neighbourhood Plan 2018-2016, Screening Draft September 2018

HRA for the Wiltshire Housing Site Allocations Plan pre-submission draft

- 5.8 The HRA for the Wiltshire Housing Site Allocations Plan pre-submission draft included an appropriate assessment of the six allocations proposed for Trowbridge and this has now been supplemented by an Addendum HRA (September 2018).
- 5.9 The HRA and its addendum concluded that these allocations have the potential to lead to adverse effects on the Bath and Bradford on Avon Bats SAC. Impacts were anticipated to occur from both recreational pressure and loss / degradation of habitat and the plan proposed these would be addressed through the Trowbridge Bat Mitigation Strategy (TBMS). This strategy was published as a Draft for Consultation on 21 February 2019. It seeks to ensure the local landscape will continue to support foraging by SAC bat species and that there will be sufficient alternative green spaces for recreation to draw the growing residential population away from the sensitive woodlands.
- 5.10 The TBMS sets out at a strategic level the mitigation that will be required in association with development to be confident that significant adverse effects to the SAC will be prevented. In summary it proposes the following zones:
- A high risk zone extending to 600m from woodlands identified as core roosting sites for Bechstein's bats. It is anticipated new build development within this zone would be unable to adequately mitigate for increases in recreational pressure and loss / degradation of habitat and therefore is unlikely to satisfy the requirements of the Habitats Regulations.
 - A medium risk zone for habitat loss and degradation where green field development will be required to provide 100% mitigation for habitat loss and also contribute to a Council scheme for mitigation of residual and in-combination effects.
 - A medium risk zone for recreational impact where new residential development will contribute to new offsite recreational provision through the Community Infrastructure Levy (CIL).

- 5.11 The TBMS is supported by a study investigating recreational use of publicly accessible open spaces, including the woodlands south of Trowbridge used by roosting Bechstein's bats⁷. The findings suggest that residents from North Bradley are more inclined to visit Picket and Clanger Woods and Southwick Country Park as opposed to Green Lane and Biss Woods. This is to be expected as the former sites are closer to North Bradley. The evidence suggests people drive to these sites and it is notable that Picket and Clanger Woods draw visitors from a greater distance than Southwick Country Park.

Analysis of policies in the NDP screened into appropriate assessment

Policy 1 Landscape Setting and HSAP Housing Sites

- 5.12 This policy lends unqualified support for HSAP allocations for Elm Grove (H2.1) and Southwick Court (H2.6). These two allocations are being considered under the appropriate assessment for the HSAP and need not be considered further here.
- 5.13 Policy 1 also supports the allocation in the HSAP for Land off the A363 at White Horse Business Park (H2.2) provided it is reduced from 225 to 175 dwellings and this reduction has been incorporated into the Council's published Schedule of Proposed Changes. In addition Policy 1 requires development to follow the layout set out in the Landscape Policy Map accompanying the policy and requires there should be no development in the North Bradley Landscape Protection Area. Assuming this allocation is acceptable under the appropriate assessment for the HSAP, the question for the appropriate assessment of this NDP is whether the layout constraint imposed by the NDP could in itself lead to adverse effects.
- 5.14 Evidence from ad-hoc records indicates that North Bradley NDP area is of importance to the SAC features. In relation to Bechstein's, it appears this is due to the NDP area being located between the large breeding roosts south of Trowbridge / Westbury and the hibernation sites east of Bath. For greater and lesser horseshoes the attraction is likely to be the availability of suitable buildings within a pastoral setting. The records suggest that key habitats for all three species are likely to be the River Biss corridor, railway corridor and the network of small grazed fields / hedgerow boundaries, but no systematic survey has been completed. Such a survey would be impractical on the basis of cost and unfeasible for Bechstein's due to the limitation of current survey techniques which cannot distinguish this species on bat detectors.
- 5.15 Preliminary work for the TBMS identified that loss of habitat within several hundred metres of breeding woodlands had a high risk of causing negative impacts on Bechstein's. Land allocated at White Horse Business Park ('the gap') lies outside this zone but it falls within a zone of moderate risk where land take will require significant mitigation. Having identified 'the gap' as being available and appropriate for development, Wiltshire Council sought to ensure it would be suitable for development by constraining housing quantum / footprint to ensure a sizeable proportion of open land would be retained and enhanced for bat mitigation. A precautionary approach was taken, as required by the Habitats Regulations. By allocating the site for 175 dwellings, the Council was able to demonstrate, beyond reasonable scientific doubt, that the allocation would not adversely affect the SAC.

⁷ Panter, C., Lake, S. & Liley D. (2018) Trowbridge Recreation Strategy and Visitor Surveys. Unpublished report by Footprint Ecology for Wiltshire Council

5.16 Close examination of 'the gap' shows that potential for habitat use by bats is as follows:

- Pasture and field hedgerows, particularly around Little Common Farm / Willow Grove, Kings Farm / Kings Folly and at the northern end of the allocation – potential for foraging by all three species, commuting by greater horseshoes and Bechstein's
- Tree belt along western edge of White Horse Business Park – potential for foraging and commuting by all three species
- Individual trees with existing holes etc (survey required to determine whether any currently exist in the allocation) – potential for night and day roosting by Bechstein's, possibility of small maternity roosts (Bechstein's)
- Individual trees without holes etc – potential for future night and day roosting by Bechstein's, small maternity roosts of Bechstein's

5.17 The Landscape Policy Map in the NDP aims to identify land which would be suitable for housing. It includes buffers for hedgerows and trees but does not allocate land for drainage and open space. The remainder of 'the gap' is designated as North Bradley Landscape Protection Area.

5.18 On the basis of 30 units per hectare, it appears this layout would be able to accommodate the 175 units allocated in the HSAP. It would lead to loss of pasture land, fragmentation of hedgerows, deterioration of the remaining hedgerows due to light spill and loss of trees due to amenity / health and safety issues. However, in principle, I consider that the scale and nature of these losses is consistent with that anticipated for the HSAP and could be mitigated within the undeveloped Landscape Protection Area. Importantly the layout maintains a continuous wide corridor of habitat running the full length of the allocation from north-west to south-east which would help to maintain habitat connectivity between core roosts. Drainage lagoons and open space, provided these did not include any lighting, would be compatible with bat mitigation measures located within 'the gap'.

5.19 I note that, until detailed surveys of trees are undertaken, it remains unclear whether any existing Bechstein's maternity roosts are present on site. My presumption is that such a roost would have to be retained within a buffer of habitat and as such it is very unlikely it could be integrated within the development site. However, I believe the risk of a maternity roost this far from the main breeding woodlands is low. There is a greater risk of surveys identifying horseshoe roosts in buildings either within or outside the allocation boundary however I consider the layout is generally robust to this possibility.

5.20 As a result of street lighting on the A363 and Woodmarsh/Westbury Road which together completely encircle the allocation, there is no obvious dark route of entry for bats. Concentrations of lighting columns at roundabouts on the A363 and A350 may be influential in directing bat flight lines. In view of this and radio-tracking studies conducted for Ashton Park, it is possible that bats approaching from the east will be more likely to cross the A350 east of Yarnbrook and then the A363 just north of Meridan Park where an area of land in the White

- 5.25 The supporting text for Policy 2 states at paragraph 8.30 that *“All new housing in the NDP area will lead to recreational impacts on core bat roosts in woodlands to the south of Trowbridge in combination with other developments. Developer contributions will therefore be used to provide mitigation measures as set out in the Trowbridge Bat Mitigation Strategy. While it is not anticipated that housing coming forward within the settlement boundary will impact on habitat used by bat species which are features of the Bath and Bradford on Avon Bats SAC, where this is necessarily the case, development will be expected to comply with the approach outlined in the Trowbridge Bat Mitigation Strategy.”* This provides confidence that development coming forward through the NDP will not be in conflict with the TBMS.

Recommendation for Policy 2: Housing – General. No further recommendations for changes.

Policy 3 – Housing NDP Sites

- 5.26 Park farm is allocated outside the settlement boundary for an indicative number of 35 dwellings and 54 Woodmarsh is allocated for an indicative number of 25 dwellings. These allocations will lead to loss of bat habitat and recreational impacts on the woodlands used by breeding Bechstein’s.
- 5.27 The TBMS recognises that green field sites will come forward as part of neighbourhood plans in addition to the 6 sites allocated for Trowbridge. The TBMS takes the same approach for neighbourhood plan allocations as HSAP allocations to ensure a consistent approach to compliance with the Habitats regulations. In particular:
- a) Sensitive habitat features on and adjacent to allocation sites will be retained and buffered from development (including residential gardens) by wide, dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by SAC bats;
 - b) Development will deliver new habitats off site to mitigate for residual and in-combination habitat losses due to the effect of ongoing urbanisation at a landscape scale, and;
 - c) Development will deliver measures to mitigate for in-combination increases in recreational pressure which are likely to occur at publicly accessible woodlands used by breeding Bechstein’s bats
- 5.28 While b) will be delivered through S106 contributions and c) will be delivered through CIL, a) will be achieved through on site measures and this will considerably reduce the housing capacity of allocation sites. In this context, I note that while the capacity of Park Farm seems realistic, the quantum projected for 54 Woodmarsh may not be achievable if it is to meet the requirements of a) above. If this is the case, additional land off site must be identified for mitigation and included in the planning application boundary.
- 5.29 It is expected that the NDP allocations will need to be designed in full compliance with the guidance contained in the TBMS for both habitat and recreational impacts. As the TBMS will exercise significant control over designs coming forward, the following wording has been added at point (v) for Park Farm SHELAA 322 and point (iv) for 54 Woodmarsh SHELAA 1040,

Horse Business Park remains undeveloped. The Landscape Policy Map would accommodate this scenario but bat flightlines from the south would be more constrained.

- 5.21 While other layouts could accommodate the proposed quantum of housing, this will be one of the few options which allocates sufficient land for mitigation, preserves the most valuable habitats and their connectivity within the site, and maintains habitat networks beyond the allocation boundary.
- 5.22 Since preparing the HRA for the SEA and HRA Screening Draft of the plan, I have been made aware that the layout of the proposed North Bradley Landscape Gap as set out in both September 2018 and January 2019 versions of the NDP is at odds with the Council's proposals for development on Land at White Horse Business Park (site H2.2). Specifically, the Council intends for housing to come forward adjacent to the business park and that the gap should therefore lie adjacent to North Bradley. This is referred to in the Community Area Topic Paper for Trowbridge supporting the HSAP. Therefore, although individually the HSAP and NP allocations would not lead to adverse effects, taken in-combination it appears that a) most of the allocation site could be developed leaving insufficient land to be certain that the area could function as a bat corridor and b) there would be insufficient green land remaining to provide the mitigation for development required by the TBMS. Given that the HSAP is at a more advanced stage of planning, I conclude Policy 1 of the NDP would lead to adverse effects.

Recommendation for Policy 1: Landscape Setting and HSAP Housing Sites. The layout of the North Bradley Landscape Gap should be reconsidered in light of Wiltshire Council's proposals for allocation H2.2 Land off the A363 at White Horse Business Park and adjustments made to ensure that the policy does not give rise to adverse effects in-combination with the HSAP.

Policy 2 Housing - General

- 5.23 Residential development within the settlement boundary at North Bradley has the potential to lead to increased recreational use of the publically accessible woodlands containing core bats roosts, i.e. Pickett and Clanger Woods, Green Lane and Biss Woods. Recent development at Castlemead demonstrates recreational pressure could be having an adverse impact on this sensitive species and while recreational pressure from any single development is unlikely to trigger effects, there is a significant risk that the combined pressure from proposed development around Trowbridge would cause a gradual reduction in both breeding success and use of the woodlands by this bat species.
- 5.24 Few residents will be expected to visit the woodlands on foot due to the distance, most will park at Green Lane Wood and Pickett and Clanger Wood. Such parking is limited but understood to not yet be at full capacity. Windfall development can therefore be expected to make a small contribution to recreational impacts in-combination with other allocations and windfall development. The TBMS provides a mechanism to mitigate these impacts through CIL contributions and no impact is therefore expected to occur as a result of this policy.

"In view of the risks this development presents to the SAC, this development will be expected to be surveyed, designed and mitigated in full accordance with the Trowbridge Bat Mitigation Strategy. Full mitigation for loss of habitats must be achieved within the application boundary." This wording provides confidence that the policy will not lead to adverse effects for the SAC.

Recommendation for Policy 3: Housing NDP Sites. No further recommendations for changes.

Policy 4 Local Green Space

- 5.30 Trowbridge football field is located immediately adjacent to the settlement boundary on the south side of Trowbridge. From aerial photographs most of the field is closely mown pitches and it is enclosed on all four sides by farmland hedgerows. It lies within a corridor of green fields on the south side of Trowbridge which are presumed, on a precautionary basis, to be of significance for those bat species which are features of the SAC. It is also adjacent to HSAP allocations for Elm Grove Farm and White Horse Business Park 2.
- 5.31 Policy 4 allows for "...extension or enhancement of the existing recreational facilities for the recreational benefit of the community..." The main concern from a bat perspective would be installation of lighting, especially floodlighting as this has the potential to lead to impacts alone and in-combination with other development. There are no specific proposals in the plan but anticipating that new housing will lead to more intensive use of sports facilities, an application for flood lighting is not unlikely. Applications would be tested under the Habitats Regulations and potentially refused if it could not be demonstrated there would be no adverse effects on the integrity of the SAC. The TBMS provides detailed guidance on surveys and mitigation which will be expected from lighting proposals in the Trowbridge area. Full reference is made to the TBMS in Policy 5 drawing specific attention to lighting issues and therefore I conclude there will be no adverse effect of this policy on the SAC.

Recommendation for Policy 4: Local Green Space. No recommendations for changes.

Policy 6 Developer Contributions Policy

- 5.32 This policy identifies that improving existing footpaths and installing new cycle paths to Trowbridge will be priorities for CIL spending by North Bradley Parish Council. As discussed for Policy 4 above, such works can impact on bat flight lines, roosts and foraging habitat by removing, damaging or illuminating vegetation used by bats. The TBMS provides detailed guidance on surveys and mitigation which will be expected from footpath and cycle path proposals in the Trowbridge area. Full reference is made to the TBMS in Policy 5 and therefore I conclude there will be no adverse effect of this policy on the SAC.

Recommendation for Policy 6: Developer Contributions Policy. No recommendations for changes.

of precautionary assumptions to counteract any constraints of the data used. Taking the favourable condition of the SPA into consideration, it was considered that existing mitigation measures in place for the Core Strategy would continue to provide an effective, timely and reliable means of mitigating any additional effects from the HSAP should they arise.

Analysis of policies in the NDP screened into appropriate assessment

Policy 1 Landscape Setting and HSAP Housing Sites

- 6.5 As for the Bats SAC, the only matter for the current assessment is whether the proposed layout in policy 1 could contribute to adverse effects Salisbury Plain SPA.
- 6.6 The White Horse Business Park allocation lies just inside the 6.4km radius where housing numbers are assumed to contribute to recreational pressure. Although a small part of the allocation lies outside this limit, this is insufficient in area to accommodate the 175 dwellings being allocated. In any case the 6.4km is a tool for estimation purposes and does not represent a precise boundary where impacts will or will not occur. The distribution of housing resulting from Policy 1 is likely to be no worse or better in terms of the number of recreational visits it generates to the Plain than any other layout proposed for the allocation.

Recommendation for Policy 1: Landscape Setting and HSAP Housing Sites. The policy does not give rise to adverse effects. No changes are required to wording of the policy or supporting text.

Policy 2 Housing - General

- 6.7 This policy places constraints on windfall development but does not propose development in itself. In view of the mitigation measures currently in place for the Core Strategy, which were retested for the HSAP and found to meet the requirements of the Habitats Regulations, I do not consider that this policy would lead to adverse effects.

Recommendation for Policy 2: Housing - General. The policy does not give rise to adverse effects. No changes are required to wording of the policy or supporting text.

Policy 3 - Housing NDP Sites

- 6.8 A further 60 dwellings are allocated through this policy, Park Farm lies 6.3km from the SPA and 54 Woodmarsh lies 6km away. Sixty dwellings will give rise to 136 people, 1% of which can be expected to visit the Plain on a regular basis. This scale of visitor pressure would not contribute significantly to pressures on the Plain and is readily covered by the mitigation approach taken adopted for the Core Strategy and the HSAP.

Recommendation for Policy 3: Housing NDP Sites. The policy does not give rise to adverse effects. No changes are required to wording of the policy or supporting text.

Conclusion for the Bath and Bradford on Avon Bats SAC

- 5.33 Policy 1 has the potential lead to in-combination effects as the land it allocates for housing is intended as green space in the HSAP. A wide green corridor is necessary to provide certainty that SAC bat species will be able to navigate, forage and potentially roost between the White Horse Business Park and North Bradley during and after development. This policy must therefore be revised before the plan is adopted.

6 Appropriate Assessment – Salisbury Plain SPA

Background to the Salisbury Plain SPA

- 6.1 Salisbury Plain SPA encompasses a plateau of chalk grassland, which supports the following SPA features: breeding common quail, Eurasian hobby, stone-curlew and non-breeding hen harrier. Details of the conservation objectives are available online. The current version is dated 30 June 2014.
- 6.2 Evidence from research has demonstrated that stone-curlew is particularly susceptible to recreational pressure and the Council has recognised this in the HRA for Wiltshire Council Core Strategy which was supported by a strategic HRA for housing development⁸. This has been updated to support the HSAP⁹ and these documents should be referred to for the background details for this European site.
- 6.3 In consultation with Natural England, the other features are not considered to be vulnerable to recreational pressure.

Plans and projects to be considered in combination

- 6.1 The screening Assessment found that the North Bradley NDP would not lead to significant effects on the Salisbury Plain SPA alone. Impacts would only occur in combination with other plans and projects. The following plans and projects have been taken into consideration:
- Wiltshire Core Strategy (Adopted January 2015)
 - Wiltshire Housing Site Allocations Plan submission document May 2018 with proposed schedule of changes dated September 2018
 - Army basing Programme delivering 917 dwellings at 4 sites in close proximity to the Plain

HRA for the Wiltshire Housing Site Allocations Plan pre-submission draft

- 6.4 Evidence from a visitor survey commissioned by the Council in 2015 demonstrated that 75% of visitors accessing the plain lived within 6.4km of the SPA boundary and 1% of the population within that distance would be expected to visit on a regular basis. Using these findings the HSAP HRA calculated that the housing sites plan would increase visitor numbers to the Plain by 1% over the estimates calculated for the Core Strategy. This figure incorporated a number

⁸ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreational pressure from redevelopment), Wiltshire Council, 30 March 2012

⁹ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreational pressure from residential development), Wiltshire Council, reviewed in May 2018

Second SEA Screening (.... 2019)

Third HRA Screening (....2019)

Appendix 8: Cabinet Minutes 3rd July 2018

SEE BOLD TEXT (emboldened for clarity)

Agenda item

Wiltshire Housing Site Allocations Development Plan Document - Proposed Submission Materials

Meeting of Cabinet, Tuesday, 3rd July, 2018 9.30 am (Item 257.)

View the background to item 257.

* Report by Alistair Cunningham, Corporate Director

Please that we will not start this item until 10:30am.

Minutes:

Councillor Toby Sturgis presented the report which: provided an update to Cabinet on the outcome of the formal consultation on the 'Wiltshire Housing Site Allocations Plan - Pre-submission draft plan (June 2017); sought Cabinet's recommendation to Council that the Plan, together with a schedule of Proposed Changes, should be approved for the purposes of submission to the Secretary of State and commencement of the independent Examination process; and sought delegated authority to make appropriate arrangements for submitting the prescribed documents and supporting materials to the Secretary of State; and respond to any consequential actions as directed by the Inspector relating to the Examination.

In moving his proposal, Councillor Sturgis referred to the Addendum that had been prepared following the deferral of the item from Cabinet of 15 May 2018 and proposed further proposed changes be made to respond to the issues raised by the community through the consultation with Wiltshire Councillors and town and parish councils on the proposed changes to the Wiltshire Housing Site Allocations Plan 15th May -11th June 2018, that:

- (a) Policy 1 to delete site allocations H1.2, H1.3 and H1.4 in relation to Market Lavington and delete section on Devizes Community Area at paragraphs 5.22 to 5.37,
- (b) Amend Policy H2 to delete site allocation H2.13 in relation to Crudwell and delete section on Malmesbury Community area at paragraphs 5.111 to 5.114,
- (c) Amend Proposed Change 39 (site allocation H2.2, land off the A363 at White Horse Business Park, Trowbridge) to reduce the proposed dwelling increase by 50 dwellings,**
- (d) Add to Proposed Change 69 (site allocation H2.12, East of Farrells Field, Yatton Keynell) to delete the words "Access will be taken from Farrell Fields" from paragraph 5.110.

Councillor Sturgis also proposed that there were some technical amendments to the overall wording of the proposal.

In justifying the further proposed changes, Cllr Sturgis referred to the addendum, and provided clarification as follows: progress had been made with the Market Lavington Neighbourhood Plan and there was a good supply of housing in the Eastern Housing Market Area; housing has been permitted in the Malmesbury Community Area to bolster the housing numbers and the Crudwell Neighbourhood Plan had made good progress; **and the reduction in the increase in housing numbers on site H2.2 would provide for landscape buffer for North Bradley.**

Matters highlighted in the course of the presentation and discussion included: that the documents had been prepared to ensure that an up to date development plan was in place; the importance of having a sufficient housing land to meet demand to mitigate against developer led planning; that all the comments received on the consultation would be sent to the Secretary of State and an Inspector who then decides what they want to look at before making their recommendation through the examination process; the relationship of the plan to the core strategy adopted by Wiltshire Council; the overall level of growth allocated in the proposed plan and the need to plan in excess of need; how the soundness of the plan is assessed; how the competing needs of communities are balanced; how the changes to planning policy are taken into account; the need to make a proposal based on the most up to date information; how brownfield sites are taken account of in the plan, and the impact of the assessment of deliverability of these compared to greenfield sites; the views of the inspector taken from the Chippenham Site Allocations Plan regarding the Council's approach to assessing the viability of brownfield sites; the changes proposed as part of the consultation; and the desire to work further with neighbourhood plan groups.

Councillor Matt Deane, Chairman of the Environment Select Committee, stated that the committee acknowledged the complexity of the process set out by central government, and that they were broadly satisfied that the process had been undertaken properly by the Council.

The Leader noted that the following people had submitted questions and that the responses to these had been published in the agenda supplement: Graham Hill, Michael Roberts, Norman Swanney, Geoff Whiffen, Steve Wylie, Rachel Hunt, Julie Baptista, Tristan Stevens.

In response to a supplementary question from Geoff Whiffen relating to Trowbridge, officers from Democratic Services stated that they would investigate why a petition received had not been acknowledged in the report.

In response to concerns raised by David Feather that insufficient weight had been given to North Bradley's Neighbourhood Plan, Councillor Sturgis stated that other neighbourhood plans were further forward, and could therefore be given greater weight. Councillor Sturgis went on to say that: he hoped that the proposed amendments to the White Horse business park site would go some way to maintaining a gap between North Bradley and Trowbridge; and that Wiltshire Council would continue to work to support the North Bradley neighbourhood plan so that it would be better progressed by the time of the examination in public.

In response to concerns raised by George Bunting that issues raised in Trowbridge had not been adequately addressed, the Leader stated that she personally, and other Councillors and officers, had met to discuss issues raised in the Trowbridge Committee, and with specific reference to the issue of the Queen Elizabeth playing field, that she was now satisfied that the proposals were appropriate.

In response to an issue raised by Councillor Ian Thorn, Councillor Sturgis stated that he had been in discussion with agents and owners regarding the Bowyers site and was keen to see the site progress, but that the cost of remediation work required on the site was one of the reasons that it had not. He also stated that whilst there is a role for Area Boards to help promote consultation on spatial planning, that Councillors had to be mindful of not appearing to fetter their decision making.

Councillor Sturgis, in summing up, emphasised the importance, in the next Local Plan, of identifying sites large enough to bring the contributions that would pay for the infrastructure needs of the growing communities.

Councillor Darren Henry, Portfolio Holder for Spatial Planning, arranged to meet any members of the public after the meeting who wished to discuss further issues arising from the discussion.

In response to an issue raised by Councillor Steve Oldrieve, Councillor Sturgis reiterated the point that the inspector, when considering the Chippenham Site Allocation plan, had supported the Council's approach to the assessment of brownfield sites in Chippenham, and that the Council had continued to take a realistic view on the deliverability of brownfield sites.

In response to issues raised by Roger Williams, Councillor Sturgis stated that issues such as access and the location of housing within a site are matters that can be determined as part of individual planning applications.

In response to issues raised by Councillor Brian Dalton, Councillor Sturgis stated that he understood the concerns raised about the impact of developments on traffic but that he trusted the professionalism of the officers and have confidence in their advice. Furthermore, he had not seen alternative sites presented with better evidence to support them.

The Leader thanked all the officers and Councillors for their hard work in putting the plan together and for working hard to address the issues raised by the community.

Resolved

That having considered the outcome of the formal consultation, Cabinet:

- (i) Endorses the draft Plan as sound and legally compliant, as set out in Appendix 1;
- (ii) Endorses the schedule of Proposed Changes to the draft Plan in Appendix 1, as set out in Appendix 2 subject to the additional proposed changes in the Addendum to the Cabinet report and further additional proposed changes set out below, for submission to the Secretary of State for Housing, Communities and Local Government to inform and assist the Examination process:
 - (a) Policy 1 to delete site allocations H1.2, H1.3 and H1.4 in relation to Market Lavington and delete section on Devizes Community Area at paragraphs 5.22 to 5.37,
 - (b) Amend Policy H2 to delete site allocation H2.13 in relation to Crudwell and delete section on Malmesbury Community area at paragraphs 5.111 to 5.114,
 - (c) Amend Proposed Change 39 (site allocation H2.2, land off the A363 at White Horse Business Park, Trowbridge) to reduce the proposed dwelling increase by 50 dwellings,**
 - (d) Add to Proposed Change 69 (site allocation H2.12, East of Farrells Field, Yatton Keynell) to delete the words "Access will be taken from Farrell Fields" from paragraph 5.110;
- (iii) Recommends that Council approves the draft Plan as set out at (i) together with the Schedule of Proposed Changes as set out at (ii) and supporting information for submission to the Secretary of State to commence the independent Examination process subject to amendment in (iv);

(iv) Authorises the Director of Economic Development and Planning in consultation with the Director of Legal and Democratic Services and the Cabinet Member for Planning and Strategic Asset Management to:

(a) make any necessary changes to the Plan and supporting documents in the interests of clarity and accuracy before it is submitted to the Secretary of State;

(b) approve the detail of any additional or updated technical document or supporting evidence before it is submitted to the Secretary of State;

(c) make appropriate arrangements for submission of all documents relating to the Plan, including the supporting evidence (including the Equalities Impact Assessment required by Section 149 of the Equalities Act 2010 at Appendix 6), to the Secretary of State;

(d) make all the necessary arrangements for Examination including - the appointment of a Programme Officer, the undertaking and/or commissioning of other work necessary to prepare for and participate at the Examination; and the delegation to officers and other commissioned experts to prepare and submit evidence to the Examination and where necessary, appear at any hearing sessions and represent the Council;

(e) authorise that officers request that the Secretary of State recommends modifications to make the Plan sound in accordance with Section 20 (7C) of the Planning and Compulsory Purchase Act 2004 (as amended); and

(f) implement any consequential actions as directed by the Inspector relating to the Examination, including undertaking any consultation where necessary, in order to respond to matters raised through the Examination.

Reasons for Decision:

To ensure that progress continues to be made on maintaining an up-to-date development plan for Wiltshire, in line with the timetable set out in the Council's Local Development Scheme and statutory requirements.

In accordance with legislative requirements, the proposed resolution enables the submission of a sound Plan. The Council will need to approve the submission of the Plan to the Secretary of State for Examination.

Appendix 9: Correspondence with County Ecologist

From: Kilgallen, Louisa [<mailto:Louisa.Kilgallen@wiltshire.gov.uk>]
Sent: 07 September 2018 18:45
To: Parish Council; Lee Lee
Cc: David and Barbara Feather; Cox, David; Kilmister, Michael
Subject: RE: Professional opinion re HSAP298

Dear Karin,

The North Bradley neighbourhood Planning group has asked for my advice in relation to 3 options for a landscape gap that would deliver the necessary habitat for offsetting impacts on Bechstein's bats. I am providing the following advice without prejudice to any subsequent HRA that's undertaken for the plan, i.e. I haven't assessed the following advice under the Habitats Regulations and it's possible that a HRA could pick up on matters I have not identified here.

There is no obvious bat flight route through the gap between North Bradley and The Business Park. But the railway, the Biss floodplain and the pattern of hedgerows and tree planting will significantly influence where bats will tend to fly and forage. The map that I've marked up with an orange and red potential bat flight route is based on what I've picked up from aerial photographs and old-maps.co.uk. It does not represent what bats actually do, it's a guess. I've included the map to illustrate my comments and although this advice might be helpful to include in supporting documents, it should not be presented within the neighbourhood plan itself. I should point out that so far no specific bat surveys have been undertaken for this area and until they are, these and any other suggested routes for bats remain conjectural.

Along the north east side of the allocation site, The woodland buffer to the business park is likely to be used by bats as are the fields, hedgerows and trees around Little Common Farm and Willow Grove. The historical maps show that Little Common leading up to Little Common Farm was lined by trees in the late 1800s. This feature was undoubtedly used by bats at that time and may continue to be so. It is also just possible to trace the former hedgerow patterns in the vegetation which is currently undeveloped at the southern end of the business park. This is the area where bats are most likely to cross the railway and the A363 heading from the woodlands into the allocation site as shown by the red route.

Along the south west side of the allocation, the orange route, the gardens and paddocks provide some potential as does land around Kings Lodge, Kings Farm and Manor Farm House. However the small fields, hedgerows and trees shown around Woodmarsh Farm on the old maps are less evident now.

All options have the same implications for bats in the vicinity of the Hitachi building. Here the access road into a future development site would go through land which is also likely to be the route that bats use coming from the south. However, this area, and particularly the land around and to the south of Manor Farm House has been significantly modified from the late 1800's. Although I would expect bats to be following the River Biss to the south Manor House Farm, it seems the landscape may have little to entice them to diverge northwards from the Biss onto the orange route I've marked on the map.

We should assume that gardens and paddocks outside the Landscape Gap may be developed in due course. Protected habitat for Bechstein's bats must be resilient to such changes. This assumption alone makes it difficult to be able to support Option 2 as the Landscape Gap could, in decades to come, emerge as two oases of undeveloped land rather than the very broad corridor we are looking for to facilitate movement in the SE-to NW direction and vice versa.

Options 1 and 3 both have the same arrangement at Little Common Farm. I consider this could be an important area for bats, linking as it does to undeveloped land at the south end of the Business Park. However on balance there are additional merits to Option 1 as it has a better relationship to the woodland buffer at the Business Park and also to habitat on the other side of the A363 (i.e. part of the allocation at Elm Grove Farm) where the field boundary appears to have very good potential for foraging bats. Option 1 also has a stronger link to habitat in the Business Park which is currently used by great crested newts. Option 1 would be the better of the two options for providing enhancements for this species.

You should be mindful that whichever option you go for it is possible that subsequent surveys may point towards the other option or to an as yet undefined option being preferable from a bat perspective.

I would be happy to discuss this further when you get back from holiday.

Best wishes

Louisa Kilgallen MCIEEM CEnv

Senior Ecologist

Wiltshire Council

Tel: 01225 713303

Email: louisa.kilgallen@wiltshire.gov.uk

Appendix 10: Research Team

Research for the Scoping Report was undertaken by a qualified consultant as well as a team from the community as follows:

Karin Elder
David Feather
Councillor Horace Prickett
Councillor Lee Lee.

The Consultant
David King BA (hons.) Dip. TP., MRTPI
PlanningStreet

