

North Bradley Neighbourhood Plan

Our Community 2018 - 2026



Site Selection Report January 2019

Final: revised following community engagement, meeting with
Wiltshire Council (August 2018) and SEA / HRA

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Glossary of Terms

Acronym or Term	Definition
DCLG	Department for Communities and Local Government
HNS	(Rural) Housing Needs Survey
HRA	Habitat Regulations Assessment
LPA	Local Planning Authority (Wiltshire Council)
HSAP	Housing Site Allocations Plan
NB	North Bradley
NDP	Neighbourhood Development Plan
NPPF	National Planning Policy Framework * - 'The Framework' sets out planning policies for England . Revised July 2018.
PPG	Planning Policy Guidance
Qualifying Body	Body authorized by law to create a Neighbourhood Plan. Normally the Parish Council.
SA	Sustainability Appraisal – Appraisal of the impacts of a plan to include socio-economic and environmental factors.
SAC	Special Area of Conservation (The Bath and Bradford-on-Avon SAC)
SEA	Strategic Environmental Assessment: European Directive. Plans be assessed for environmental effects.
SHLAA / SHELAA	Strategic Housing Land Availability Assessment / Strategic Housing and Employment Land Availability Assessment
SSR	Site Selection Report
WCS	Wiltshire Core Strategy

*The National Planning Policy Framework was revised in July 2018. All references in this plan are to the revised version. The SSR and Plan are also compliant with the earlier version.

1.0 Introduction

1.0 As stated in Paragraph 42 of Planning Practice Guidance, neighbourhood plans can allocate sites for development. Paragraph 44 states that these sites may be additional or alternative to those in a Local Plan. In exercising these functions, a neighbourhood plan must:

- Plan positively to support local development
- Must not be used to constrain the delivery of a strategic site allocated for development in the Local Plan.

1.1 The NPPF (which was revised in July 2018) indicates that Neighbourhood Plans can set out; *‘..detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies’* (Paragraph 28).

1.2 NPPF paragraph 29 continues:

‘Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.’

Greater detail regarding the NPPF and its influence over the NDP can be found in the accompanying Scoping Report.

1.1 Site selection is arguably the most powerful aspect of neighbourhood planning and it therefore follows from this that site selection and allocation should be the result of a careful, thorough and transparent process. Planning Practice Guidance requires sites to be deliverable (that is have a realistic prospect of being built). To be ‘deliverable’, and hence capable of formal allocation, sites must be:

- Available (A question of being in single land ownership and marketable)
- Suitable (A question of being in the right location in planning terms)
- Achievable (A question of being economically viable)

However, where a site is in a good location but cannot be proven to be available it can be included in a neighbourhood plan, not as a formal allocation, but as an ‘aspiration’. It is also possible to defer consideration of some sites until a future review of the plan (for example where necessary data is not available, or where sufficient have been allocated to meet likely need).

1.2 The above regulatory and policy context forms the basis for the criteria used in site selection in this report (see Section 3).

1.3 It should be appreciated that this report is effectively the ‘story’ of how the eventual sites allocated came to be adopted. As such it runs in chronological order from beginning to end, describing a long and complex process during which sites were considered, refined, and adopted or rejected. Some sites were considered and rejected, only to be later accepted when new evidence emerged, while some, which initially seemed promising were later rejected. Most sites underwent some kind of modification of understanding, impacting on the precise nature of any allocation, as they progressed. This is considered to be a positive thing, demonstrating a logical and transparent process.

Sections 1-3 of this report comprise initial assessment. Sections 4 and 5 comprise revisions following community engagement, discussions with Wiltshire Council and the SEA.



The site at park farm

2.0 Context and Scope

2.0 The context for site allocation falls into three parts:

- The planning policy context
- Local housing need and windfall supply
- The physical and environmental context.

2.1 The Policy Context

The legislative and government policy context has already been discussed above. The Development Plan for the area includes the Wiltshire Core Strategy (2015) and saved policies from the former district local plan. The Wiltshire Core Strategy (WCS) is currently at an early stage of review and a Housing Site Allocations Plan (HSAP) is being produced. The latter two documents however are not yet part of the formal Development Plan.

2.2 In terms of housing, the most relevant policies are WCS Core Policies 1, 2, 29, 42, 43 and 45. North Bradley is defined as a 'Large Village' and nearby Trowbridge is recorded as a 'Principal Settlement'. As a 'Large Village', North Bradley is not expected to absorb significant amounts of housing. Core Policies 1 and 2 of The Wiltshire Core Strategy (WCS) define Large Villages as;

'Settlements with a limited range of employment, services and facilities'

The overall spatial strategy for such settlements is as follows:

'Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities'

Trowbridge on the other hand is expected to sustain substantial growth, reflecting the overall spatial strategy of the plan.

2.3 The housing needs of the area are already substantially met by existing strategic allocations, including the major urban extension of Trowbridge - Ashton Park, which is partly within the parish. The WCS identifies just 165 additional houses being required across the entire community area up until 2026. The more recent Wiltshire Council Housing Supply Statements of November 2016 and March 2018 show that the required indicative number has already been provided, leaving a residual requirement of zero until. However these figures are not maxima, but minima, and it is still necessary to consider housing in the context of strategic policy and local need.

2.4 In fact, core Policy 29 states that:

‘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’.*

2.5 The now emerging Housing Site Allocations Plan (the HSAP) interprets the above to mean allocating sites outside of Trowbridge (although this was not clear from the original wording). Three of these sites are proposed in North Bradley parish.

2.6 The argument of the HSAP is that additional housing over and above that allowed for in the Wiltshire Core Strategy is required for the following reasons:

- To maintain an adequate housing land supply in accordance with Government requirements over the remaining plan period (i.e. until 2026) and reflecting the need expressed in the WCS Core Policy 29 for an additional 950 homes to be found for the needs of Trowbridge.
- To support the role of Trowbridge as a Principal Settlement
- To reflect the fact that Ashton Park has not been delivered as expected and that due to this, a shortfall of an additional 1220 dwellings will result compared with the allocation in the WCS.
- To ensure that land allocated is capable of development within the plan period to meet other objectives.

2.7 The community is not opposed to the provision of necessary housing and is mindful of the NPPF’s aim to deliver a wide choice of high quality homes and to boost significantly the supply of housing. Nevertheless, there are concerns about the impacts of the large, greenfield site proposed, especially on the separation of Trowbridge and North Bradley.

2.8 Nevertheless, it is accepted that strategic growth at Trowbridge is preferable to scattered development and that this is part of the broad spatial strategy of the WCS, aimed at delivering sustainable development by reducing the need to travel. The NDP supports the overall strategy of the WCS.

- 2.9 In an effort to:
- Help steer strategic development to the best sites
 - To balance growth with environmental needs and to,
 - Demonstrate a willingness to plan positively

the NDP team decided to carry out this site selection process of its own, based on consideration of:

- Assessment of all deliverable SHELAA* Sites
- An appraisal of the sites proposed in the draft HSAP
- Site suggestions from the community
- Relevant local environmental and contextual consideration
- The views and wishes of the community.

2.10 Core policies 29, 43, 45 and 46 cover allocation of housing in more detail and are discussed in the NDP document itself. The allocations in this report comply with those policies as well as Core Policies 1 and 2. The general principle of the WCS is to provide adequate housing for the needs of all segments of the population, including affordable homes. Housing should be distributed according to the overall spatial strategy of the WCS, namely concentrating the majority of development into existing developed areas in order to ensure access to facilities and reduce the need to travel.

2.11 Accommodating significant additional housing in or around the large village of North Bradley is complicated by an additional policy factor. This is acknowledged in the WCS and is the maintenance of a space between the developed eastern edge of Trowbridge and North Bradley itself. Paragraph 5.150 of Core Policy 29 states:

'it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning'.

One HSAP site H2.2 'Land off A 363 off White Horse Business Park' – conflicts directly with this objective.

* The SHELAA (Strategic Housing and Employment Land Availability Assessment) was published in November 2017. This replaces the former SHLAA.

2.12 **Local Housing Need and Windfall Supply**

The population of Trowbridge Community Area (TCA) has been growing steadily in line with national trends. In 2001, it was around 36,500. In the 2011 census, it had grown to 41,600. It is expected to rise to 48,500 by 2026. Overall, as shown by the Wiltshire JSA (based on 2011 Census data) Trowbridge has a lower level of child poverty than the national average but is the joint highest community area in Wiltshire at 14.8%. North Bradley is more affluent than the Trowbridge average.

2.13 Although the population is increasing:

- The Wiltshire Housing Supply Statements of November 2017 and March 2018 indicate that the need calculations of the WCS have been met and that a zero requirement remains in the Community Area until 2026.
- The Housing Land Supply is, at present, above the minimum of 5.25 Years as required by the Government.
- It is accepted that the additional requirement of 950 homes set out in the WCS is needed for strategic growth in Trowbridge.

2.14 According to paragraph 4.53 of the HSAP:

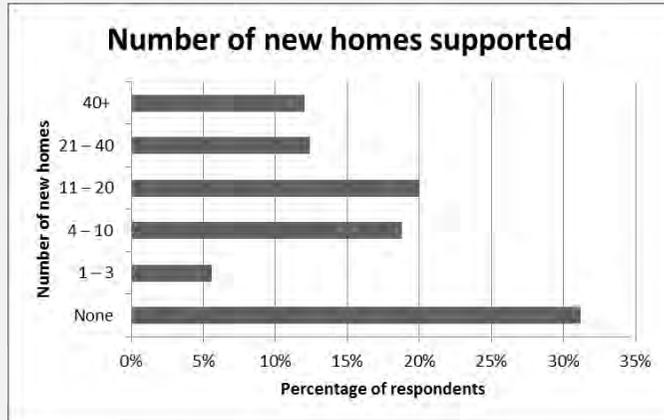
'One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south eastern extension to the town. 1,600 dwellings will be built on this site in the plan period and a further 1,000 post 2026; rather than first envisaged that the whole of the allocation would have been complete.'

2.15 In autumn 2017, Wiltshire Council's Development Officers discussed carrying out a rural housing needs survey (HNS) with North Bradley Parish Council, to establish if there was a proven local 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.

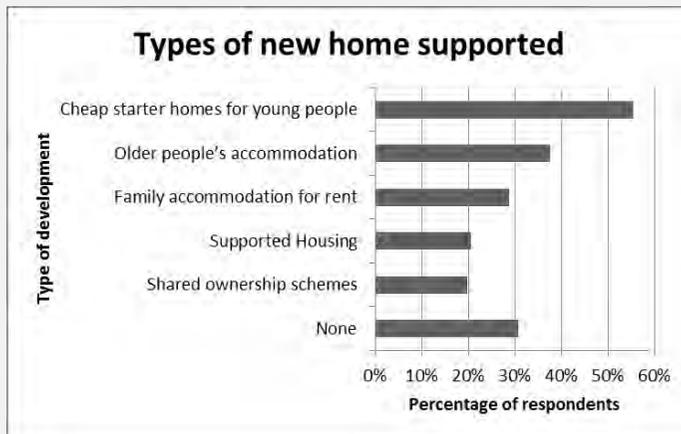
2.16 In order to carry out the housing needs survey, questionnaires were delivered to the Parish Council for distribution on the 13 November 2017. To encourage a good response, households were given a pre-paid envelope in which to return the completed survey. The council applies the data protection policy 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.

2.17 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:



2.18 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):



2.19 In terms of the amount of local affordable (as opposed to normal, market) 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

In order to meet the above need an allocation of 5 homes would be needed based on the prevailing rate of 30% and the minimum threshold of 5 applying in the Trowbridge Area. However, as the HNS makes clear, it does not give a full picture of the likely level of need. For example, in very simple terms, the HNS gives an idea of housing need over the next three years, whereas the NDP is set to run almost three times as long (8 years). Assuming a similar rate over the later 5 years of the plan would increase affordable need to around 3 homes and the number of units required to deliver this to 10.

2.20 In determining the number of homes that need to be allocated it is also necessary to consider the need for market housing. A demand for this was clearly indicated in the HNS, and census statistics confirm that the local population is relatively affluent with more ability to buy their own homes than in some other parts of Wiltshire. Population in the Trowbridge community area is projected to grow from 41,600 to 48,500 between the 2011 census and end of the plan period in 2026 (see accompanying Scoping Report (SR)). This is a growth of over 16 percent. Despite low growth in population in recent years in North Bradley, this could still cause an increased demand for new housing, as sites in Trowbridge get built out.

2.21 There is also a need to consider both flexibility and the need for new infrastructure in the parish. Flexibility is required since plans should aim to 'plan positively' and create the right conditions for the market to deliver sustainable development. New infrastructure is also needed. For example, the draft NDP policy identifies the following:

- Improvement of existing footpaths including the introduction of crossings, dropped kerbs and smoother surfaces suitable for electric buggies as well as pedestrians.
- The installation of cyclepaths linking the Parish with Trowbridge
- Improvement of local bus services
- Upgrading of recreational and other facilities at the Peace Memorial Hall and the Progressive Hall
- Provision of health care facilities within the parish
- The provision of a new non-denominational burial ground.

Meeting infrastructure aspirations relies on sufficient development taking place to provide the developer contributions sought by the NDP's developer contributions policy.

2.22 There is also the question of maintaining the vitality and viability of North Bradley as a separate entity to Trowbridge to consider. In the early community engagement for the NDP, some residents indicated that they would support new housing on a moderate scale in order to ‘support the school, the Rising Sun pub and a possible shop associated with the pub’ and because ‘extra and younger population could make football and cricket teams more viable’

2.23 In view of the above concerns it seems reasonable to add a buffer of 100% to the indicative figure above of 10 homes, bringing this to 20 as an indicative ideal minimum number. This is similar to the most popular choice amongst respondents to the HNS, which was for between eleven and twenty new homes.

2.24 Windfall Supply

In deciding whether to allocate sites, housing need was compared with a crude analysis of recent windfall supply with data provided by Wiltshire Council. The latter showed that 16 homes were delivered by windfalls over the last 10 years.

Application	Site Address	Proposal	Houses Delivered
W06.3155	Adj 19 Church Lane	1 new dwelling	1
W08.3513	Adj 34A Church Lane	1 new dwelling	1
W08.3649	3 Drynham Lane	replacement dwelling	0
W08.2831	Grasshoppers, 12 Westbury Road	Conversion to Dwelling	1
W09.3666	Land adj 7 Southwick Road	New 4 x 2 Bed dwgs	4
W10.3315	54 Woodmarsh	replacement dwelling	0
W11.3132	Lakeside Cottage, Wood Road,	Conversion of building to dwelling	1
W13.1644	Hazlehurst Southwick Road	annex into separate dwelling	1
W13.6137	Rear of 2 Hawkeridge Rd Westbury	change of use shop and office to dwelling.	1
W14.3305	The Mash Tun, Woodmarsh	Change of use from Public House to private residential dwelling	1
W14.8661	Brokerswood House, Wood Road,	Conversion of dwelling to 2 flats. Ext of time limit of W12.0120.	1
W14.8934	9a The Rank	Demolish existing dwelling and garage. Erection of new dwelling	0
W15.10329	The Kicking Donkey Brokerswood	Public House to residential dwelling	1
W16.2052	3A Ireland North Bradley Wiltshire	conversion of pool building to a self-contained dwelling	1
W16.9269	Drynham Lane Farm, Drynham Lane	Erection of two dwellings	2
10 Year TOTAL			16

2.25 However, all of the above schemes were for less than 5 units, meaning that they delivered no affordable housing. This does not necessarily mean that no sites larger than this and so delivering some affordable housing will come forward over the NDP plan period. However, it does imply that windfalls alone are unlikely to deliver more than a small amount to meet affordable housing need. This source is therefore discounted as a major source of affordable housing supply.

2.26 The Physical and Environmental Context

A fuller description of North Bradley and its rural setting can be found in the accompanying Planning Scoping Report and the NDP itself. The SEA Scoping report and SEA Environmental Reports also discuss the environmental context and the impact of the NDP upon it. However, it can be said here that North Bradley is an elongated parish, running on a rough north-east / south west axis and extending some 4 kilometers (2.5 miles) southwest of North Bradley village. It is located between the towns of Trowbridge and Westbury and is a parish of several parts, though mainly rural.

- 2.27 The main village is located around 400 metres due south of the outskirts of Trowbridge and about 2km from the town centre. Sustainable transport links are reasonable, although pedestrian and cycle facilities need improvement. There is already heavy use of motor vehicles and local congestion can result.
- 2.28 North Bradley has very limited facilities, with most residents having to rely on Trowbridge or other towns for shopping, recreation and employment. There are two village halls, a primary school and two pubs, but no shops. The White Horse Business Park is on the edge of the parish.
- 2.29 The village has an historic core, but this is surrounded by modern development, mainly from the 60's, 70's and 80's. Nevertheless, the historic centre is sensitive to change. Additionally, a wide swathe of land roughly equating to the middle third of the parish has been designated as an Area of Archaeological Potential.
- 2.30 Flood risk, from either rivers or surface water over most of the parish is relatively low. However, the maintenance of the River Biss, the balancing ponds at Yarnbrook and agricultural drainage ditches are relevant issues in managing risk. Occasional road flooding (from heavy rain) does occur at the railway bridge near Yarnbrook and at other places such as the football ground. The effects of climate change for the south west by 2050 for a medium emission scenario are as follows:
- increase in winter mean temperature is 2.1°C and increase in summer mean temperature of 2.7°C
 - increase in winter rainfall of 17% and decrease in summer of 20%.

What this means for North Bradley is likely to include increased frequency of extreme events – drought and storms with heavy rain. Flash flooding may increasingly occur – something of obvious significance to the northern part of the parish which is built over former low-lying marshland.

- 2.31 The village itself is separated from the growing town by a number of small fields, including one which is the home of Trowbridge Football Club. This 'Gap' performs a number of functions, the most important of which is to provide the rural setting for the village of North Bradley, physically separating it from the urban form of Wiltshire's principle settlement, preventing coalescence and therefore preserving its distinct rural character and sense of place. As assessment of the landscape and the possibility of creating a landscape buffer are the subjects of the 'Landscape and Visual Setting Analysis Report' a professional report which accompanies the NDP.

- 2.32 The vast majority of undeveloped land in the parish is open countryside, amounting to over 1600 acres the open and rural surroundings provide land for agriculture, as well as facilities for formal and informal recreation as well as having value for biodiversity, especially in terms of trees, hedgerows and surviving ponds. The NDP is supported by a Landscape and Visual Analysis Report. Local biodiversity may also prove to be a constraint on development, most specifically the presence of bats from the Bath and Bradford-on Avon SAC, including Bechstein's Bat, an endangered species. Details of how this may act as a constraint on large scale development is given in the accompanying Scoping Report. See also map as part of appendix 3. The shaded 'consultation areas' shown indicate where Wiltshire Council planning guidance requires developers to consult and address the bat issue. Recent HRA's (e.g. for nearby planning application 17/03269/OUT) have also been required for developments and these have indicated that the county ecologist considers that bats may also be present immediately outside these areas. North Bradley is bracketed between two parts of the consultation area.
- 2.33 In summary, North Bradley is a mainly modern rural village with an historic core, lacking facilities but close to Trowbridge. It is blessed by a rural context that helps define its identity, and in particular its status as a village separate from Trowbridge. This context is also an important reserve for biodiversity. The desirability of preserving this is recognised by the WCS. Proximity to Trowbridge makes some strategic development likely, and this is accepted by the NDP Steering Group. However, in order to be sustainable, such growth should not be so great as to destroy the rural setting, consume excessive amounts of greenfield land, nor cause unacceptable harm to biodiversity. It should not overwhelm the parish by virtue of scale.
- 2.34 The scale of development, as well as its location, is indeed a vital consideration for North Bradley. The parish is already set to receive the very large Ashton Park strategic scheme. In 2011, the number of dwellings in the parish was 736 (Nomis Data set KS401EW, Census 2011). The number of new homes which will result from Ashton Park (the majority of the housing element of this mixed-use scheme is in North Bradley parish) could be an additional 2,500.
- 2.35 The HSAP proposes an additional 350 homes at sites H2.1 (Elm Grove Farm) and H2.2 (Site Off A 363 at White Horse Business Park) (plus some additional homes as part of Southwick Court – H2.6 - not included here as most of this is in Southwick Parish). Thus, if Ashton Park is delivered with all housing in North Bradley and if all HSAP sites were accommodated as well, the parish would grow by some 2850 homes or almost 400%. This is a huge change to impose on a small rural parish and would all be at the expense of open countryside. The proportional loss of its purely rural areas is also dramatic. Out of a total area of 714 rural hectares, some 101 hectares will be lost to Ashton Park, and some 40 more hectares to the two HSAP sites above, totaling 140 hectares or some 20% of the total land area of the parish.

3.0 Methodology and Draft Conclusion

3.0 Armed with the understandings derived from section 2 above, and, at this stage, a minimum indicative 'target figure' of around 15 homes, an initial screening selection of sites was made by selecting sites from the SHELAA that would comply with the NPPF and PPG by being shown by Wiltshire Council as:

- Suitable
- Available
- Achievable
- Deliverable.

Other SHELAA sites not meeting all 4 criteria were excluded at this stage.

3.1 The sites going forward were as follows (prefix numbers refer to SHLAA / SHELAA numbering):

- 261 Land at Lower Biss Farm
- 613 Land south / south-west of Trowbridge* (HSAP Site H2.1 'Elm Grove Farm')
- 298 South / south-west of Trowbridge* (HSAP Site H2.2 'Land off A 363 off White Horse Business Park')

3.2 The following sites were shown as not deliverable in the SHELAA, however:

- 322 Park Farm – this was confirmed as available to the Steering Group by the present owner, and also as deliverable by Wiltshire Council in e mail dated 11/12/17. In view of contact with owner confirming immediate availability however, timescale should consequently be shown as a 'short-term' and not medium-term site as shown in SHLAA.
- 672 Paddock at Little Common Lane - This was confirmed as available and deliverable by Wiltshire Council in e mail dated 11/12/17 (error in SHLAA draft).
- 1040 54 Woodmarsh. Wiltshire Council could not confirm that this was available. However, site was considered to be worth surveying in case the plan later chose to indicate that it could be an 'aspirational' site – that is, be indicated to be acceptable in principle and to be considered in a further review of the plan should it become available.

These were therefore also included in the initial assessment.

* The site names for these two sites have been reversed in error in the HSAP 3.5

- 3.3 The following and final HSAP site was also included (This was shown as not deliverable in the SHELAA – a high-level assessment - but was found to be deliverable for inclusion in the more detailed HSAP confirmed by an e mail from Wiltshire Council dated 11/12/17 (error in SHLAA draft).

3565 Land South of Trowbridge / 'Southwick Court' (HSAP site H2.6).

3.4 **Sites Submitted Directly to the Steering Group**

During the site selection process, the Steering Group were contacted by two developers. One was the owner of Park Farm. The other site was at Organpool Farm, promoted by Welbeck Strategic Land, who put forward a proposed site for housing and a village shop. The developer was known to have carried out their own consultation within the village. In response to this consultation, the Parish Council, which had already carried out a site section analysis of this site, responded with their own letter given as part of appendix 9. The developer's agent was nevertheless invited to attend a parish council meeting on 9th April at 7.15 pm to explain their proposals. Both sites were considered as part of the normal site selection process.

- 3.5 Finally, the site selection process for the HSAP included review of sites that had previously been in the SHLAA. One of these was '261: Land at Lower Biss Farm'. Table 5.3 in the Trowbridge Topic paper for the HSAP concluded that this site should be excluded on the basis of likely harm to bats from the Avon Bats SAC. SHLAA site 261 is therefore dropped from the NDP site selection process as being unlikely to be suitable and hence not deliverable.

The full list of sites initially considered is therefore:

298 South / south-west of Trowbridge* (HSAP Site H2.2 'Land off A 363 off White Horse Business Park')
322 Park Farm**
613 Land south / south-west of Trowbridge* (HSAP Site H2.1 'Elm Grove Farm')
672 Paddock at Little Common Lane
1040 54 Woodmarsh
3565 Land South of Trowbridge / 'Southwick Court' (HSAP site H2.6)
N/A Organ Pool Farm, Southwick Road, North Bradley

- 3.6 While it was felt likely that SHELAA sites would be more than able to provide for an effective supply of sites for local needs for a large village like North Bradley and while government guidance indicates that evidence supporting neighbourhood plans must be 'proportionate', later community engagement as part of the SSR nevertheless also allowed for fresh sites to be suggested by anyone who was able to provide an accurate site map and written confirmation as to availability (see below).

** Site 322 was also put forward by the owner who directly approached the Steering Group in December 2017.

3.7 **Local Site Survey**

In order to add local detail to the high-level assessment of the SHELAA, site survey forms were designed by the Steering Group's planning consultant, one for each of the above sites, and a video training session was held in which the consultant explained to volunteers how the assessment should be conducted. The site survey forms are given as appendix 2.

3.8 The purpose of the form was to not to definitely determine inclusion or exclusion from the NDP but to help engage the community in the process and add more information such as:

- Local problems or issues (e.g. access, landscape impact, impact on neighbours)
- Benefits or good points
- Possible conditions required to make the site acceptable in planning terms

3.9 The site survey took place in December and January 2017/18 by Steering Group community volunteers guided using site survey forms created by the planning consultant.

3.10 **Density**

Neither the NPPF nor the WCS set appropriate density levels for development. However, in Wiltshire Council's Housing Site Allocation Plan (HSAP) Topic Paper 5 – Viability Assessment, consultants Paribas found that in the North and West HMA (in which North Bradley lies) densities of development ranged from 25- 33 per hectare. Density tended to be at the lower end of this range in smaller schemes of 0-25 units. For the purposes of this Site Selection report an indicative figure of 30dph is used to assess possible capacities of sites.

3.11 **Scale**

Wiltshire Core Strategy Policy limits housing development in Large Villages, like North Bradley. Core Policy 1 States:

'Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities'

Similarly, early community engagement and the HNS suggested that large schemes would not be supported by the community. The Tattenhall judgement (<http://www.chichester.gov.uk/CHttpHandler.ashx?id=23422&p=0>) confirmed that an NDP does not have to consider site options the community would not support. The most popular size of development being between eleven and twenty new homes. Although some residents would accept larger schemes it must be remembered that 31.2% of respondents were opposed to any new housing in North Bradley at all.

Accordingly, the objective of the NDP site allocation process is to identify homes for local need - affordable and market housing. Large scale schemes will not be acceptable, unless brought forward via the development plan process, such as the HSAP. Housing need will be assessed based on the HNS above, but with an allowance made above to ensure a supply to meet needs over the plan period. Additionally, the NDP is subject to review and future reviews will monitor need and land supply to ensure that local needs continue to be met.

3.12 As expressed in Section 2, an ideal and Indicative target figure of 20 homes seems reasonable for North Bradley. However there are other factors to consider, including:

- The need to provide a credible supply for both market and affordable homes
- The need to 'plan positively' as required by Government policy
- The need to create viable sites based on the actual ones that are available.
- The need to create a balanced plan if policies are proposed that would restrict development over a wide area.

These factors could mean that the eventual recommended allocation is higher than the ideal figure.

3.13 **Bath and Bradford-on-Avon SAC (Bat Species)**

North Bradley is not far from the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). This is a Natura 2000 site and an HRA is normally required for development that might affect it. Such HRA's have been required for recent applications in nearby Southwick. Further detail of this issue is contained within the Scoping Report which represents a description of the main evidence base of the NDP.

3.14 Core policy 29 of the WCS identified impacts on the SAC as being of importance. However, the implications of the SAC for housing development in the Trowbridge area has emerged as being a more significant issue since first being recognised in the WCS. The most recent policy position is reflected in the draft Wiltshire Housing Sites Allocation Plan which recognises that risks to the SAC may arise from development throughout Trowbridge. As a result of the HRA process, two allocations in Trowbridge were removed from the plan and six were taken through to a full appropriate assessment. This identified three sources of potential impact as follows:

- Direct loss of habitat within development sites and indirect effects on habitat due to lighting, proximity to dwellings etc.;
- Increased recreational pressure on local woodlands used by breeding Bechstein's as a result of the cumulative effects of development in the area, and;
- Residual effects on bat habitat which cumulatively lead to reductions in bat habitat at a landscape scale.

3.15 Wiltshire Council has produced planning guidance (see Appendix 4 in this document for map) and is also producing a mitigation strategy (Trowbridge Recreation Management Mitigation Strategy) to which development would contribute to delivering. In addition to new recreational resources, woodland and tree planting, it's likely that the strategy will identify zones where development will be restricted in order to buffer roost sites and protect key commuting / foraging routes.

- 3.16 The HRA for sites in the Housing Site Allocation Plan (HSAP) stated: *'Several of the allocations at Trowbridge are within areas likely to be used by bat species which are features of this SAC. The allocations are likely to contain habitat features used by these species and development could lead to their deterioration through physical loss as well as lack of or inappropriate habitat management and higher ambient light levels. These effects become more significant when the effects of the plan are considered as a whole due to the potential for significant loss and deterioration at a landscape scale'*.

It follows that a similar risk will apply to sites in the NDP which are in the same general area. The HRA goes on: *'It is recommended that the need to protect important habitat features is expressly stated in the relevant policies (H2.1, H2.2, H2.4, H2.5, and H2.6)'*. It is therefore proposed that a similar advisory should attach to relevant site selection policies in the NDP.

- 3.17 The HRA proposes to help manage risk by the implementation of a Trowbridge Bat Mitigation Strategy and by site specific HRA's on proposals. It is therefore recommended that all policies include a commitment to contribute towards the delivery of the Trowbridge Bat Mitigation Strategy and a requirement for HRA.

In view of the risks, the North Bradley NDP site selection process will bear the issue of bats in mind when considering the overall quantum of development that could be accommodated. (It has been confirmed by the county ecologist that while even individual homes may have an impact and require mitigation or even merit refusal, the larger the overall quantum of development the area absorbs over the plan period then the more likely adverse impacts would be). The general principle adopted by the NDP will therefore be that:

- Smaller rather than larger sites should be preferred
- Even though mitigation may be possible on larger sites, the best option, from a biodiversity point of view, is not to develop
- If development does occur on larger sites it should be designed to minimise impact on the bat population as much as possible..

3.18 **Rural Setting of North Bradley**

The rural setting of North Bradley is much prized by residents and surrounding fields, streams, trees and hedgerows are regarded as key elements of character which define North Bradley as a village and not as a part of Trowbridge. They provide a setting for the village, space for recreation and habitats for biodiversity, but are also appreciated for their views and sense of space. Section 5.150 of WCS Core Policy 29 states:

"it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning"

The rural setting is most critical between North Bradley and Trowbridge and this is discussed in the Landscape setting and Visual Analysis Report produced for the Steering Group by consultants in 2017. This report is available separately and a discussion of it is given in the accompanying Scoping Report. However, all countryside outside the village boundary is regarded as part of the setting and the community would not want to see this surrendered except for the most important local and strategic priorities. These could include meeting the need of Trowbridge in the strategic sites at Elm Grove Farm and Southwick Court and accommodating established local housing need. However, preservation of the 'gap' is a formal Objective of the NDP and sites are assessed against this and all other objectives.

3.19 The wishes of the community

Early community engagement (see accompanying Consultation Statement) suggested that the appetite for additional new housing was limited, although overall the community is not opposed to necessary growth for local needs, especially regarding affordable housing and homes for older people. It was accepted that some outward expansion of Trowbridge is inevitable, and that limited housing development in North Bradley would have some benefits. However, it was also felt important to preserve a credible landscape gap between the village and Trowbridge, and so development should take place without compromising this. At the same time, it was noted that large scale schemes in North Bradley would conflict with WCS policies for a large village and this policy had considerable local support

3.20 Partly because of the mixed response to the housing question, it was decided to involve the community in an extra round of community engagement specifically dedicated to housing sites before the major Regulation 14 consultation. For this reason, the methodology of this SSR includes community involvement in site surveying and a questionnaire regarding sites. Community approval is an important criterion. Neighbourhood plans are not obliged to consider in detail sites that would not be approved by the community. The reason for this is simple; all plans must pass a referendum and a plan would be likely to fail if it included a site that would be likely to lead to a 'no' vote. On the other hand, site selection must be a thorough and objective process and the plan must meet the 'Basic Conditions' which include delivering 'sustainable development'.



3.21 NDP Objectives

Draft NDP objectives were created from the early community engagement on the plan. Since the NDP is intended to deliver the plan's Objectives, each site was also assessed against these:

PLAN 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 allow the community to grow and develop in a sustainable way, with new housing and matching infrastructure.
3. To improve transport for residents including:
 - * Reducing vehicle speeds
 - * Improving parking
 - * Improving sustainable transport including bus service and the creation and maintenance of the network of paths and cycle-ways.
4. To influence the detailed planning of development, to ensure the Parish community benefits in terms of improved infrastructure.
5. To encourage and support community facilities such as shops, pubs, places of entertainment and leisure and new and existing open space.
6. 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.
7. 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.

3.22 **Site Selection Matrix**

A site selection matrix was developed by the planning consultant and this is given below. Following the site survey, the survey forms were collected and the information from them was added to the matrix. The completed forms are given as Appendix 2.

3.23 The Matrix includes consideration of 'suitability' 'availability' and 'achievability' (essentially viability) by relying on SHELAA assessment thereby complying with advice in the NPPF and PPG. However, it seeks to add local and policy detail by considering the local data provided by the survey forms.

3.24 When completing the site matrix, the planning consultant also scrutinised each site in terms of:

- Planning policy (e.g. appropriate scale in relation to a Large Village, overall Wiltshire Spatial Strategy)
- Infrastructure availability (e.g. school, facilities and road capacity)
- Environmental issues (landscape, biodiversity, heritage, flooding, highway matters, listed buildings etc.)
- Correlation with Vision and Objectives of NDP
- Community approval likelihood (based on early community engagement and past planning applications)
- Any mitigation or conditions which might be appropriate.

3.25 The above processes ensure that the sites comply with advice in the NPPF and PPG. However, the Steering Group has sought to add local detail by considering whether community approval would be likely, whether the site would be consistent with the NDP Objectives suggested by community engagement, whether the site would comply with planning policy and, arguably most importantly, a description of site issues and constraints based on a survey of the site, together with any mitigation of conditions which might be appropriate. Essentially the process was intended to provide a robust site selection method, which added local detail and value to the existing policy framework, thereby planning positively and helping to facilitate sustainable development that fits with the wishes of the community.

INITIAL Site Selection Matrix

Site	Positive SHELAA assessment? 'Suitability'	Positive SHELAA assessment 'Availability'	Positive SHELAA assessment 'Achievable'	Size, Possible Dwelling Numbers and Density	Compliant with WCS Policies 1, 2, and 29?	Community Approval? (Community Engagement) Scale appropriate?	Conflict with which NDP Objectives ?	Impact on Bats SAC?	Local Issues and Constraints? Conditions necessary/ comments?
298 'Land off A363 off White Horse Business Park' (HSAP Site H2.2)	Yes Meets Strategic need through development plan	Yes	Yes	22.52ha 675* 30 dph	Yes. Conflicts with CP 1 and 2, but Provided for to meet strategic needs of Trowbridge in CP29	No.	1, 2, 3, 6	Yes, likely. Very Large scale in open country side.	Conflict with landscape setting of North Bradley. Negative impact likely on Biodiversity (SAC and bats) Location lacks facilities – travel to Trowbridge likely to lead to congestion. Drainage, neighbour and heritage issues would require mitigation (see site survey report, Appendix to NDP) Scale is large
322 Park Farm	Yes	No ('unknown'). But confirmed by owner as available Dec 2017.	Yes	3.14ha 94* 30 dph	Contrary to CP 1 and 2 being development outside the settlement boundary. However possible via an NDP.	Possible if on smaller scale and to meet local need only	1 (if rec. area lost /not replaced) 2, if large-scale scheme not for local need 3,5 (as 1) 6? 7? Could avoid impacts if scheme small /well designed.	Yes, likely. Would be less from small scheme	Large scale scheme here would not be acceptable on policy (Core Policy 1) grounds, biodiversity, neighbour, access and sustainability. But smaller scheme might be acceptable. Need to retain and enhance hedgerows, set development back from neighbours, control construction hours, take care with setting of Broadleigh House and evaluate for archaeology. Access would need to be determined. If rec area lost would need to be replaced.

* But actual capacity less – see below)

Site	Positive SHELAA assessment? 'Suitability'	Positive SHELAA assessment 'Availability'	Positive SHELAA assessment 'Achievable'	Size, Possible Dwelling Numbers and Density	Compliant with WCS Policies 1, 2, and 29?	Community Approval? (Community Engagement) Scale appropriate?	Conflict with which NDP Objectives ?	Impact on Bats SAC?	Local Issues and Constraints? Conditions necessary/ comments?
613 (HSAP Site H2.1 'Elm Grove Farm')	Yes. Meets Strategic need though development plan.	Yes	Yes	11.98ha 360* 30 dph	Yes. Provided for in meeting strategic needs of Trowbridge in CP29	Possible – edge of parish and well-related to Trowbridge.	6?	Possible. Large scale and not for local needs. But is on edge of town.	Some local issues including access, landscape design and biodiversity. However, the scheme is outside the landscape setting area proposed by the NDP and therefore avoids conflict with most NDP Objectives. a good scheme might be able to overcome problems. This is the most acceptable of the HSAP sites.
672 Paddock at Little Common Lane	Yes Within settlement boundary and could meet local need.	No ('unknown'). But confirmed by Wiltshire Council as available Dec 2017	Yes	0.60ha 18 30 dph	Probably - But may be issues with CP 57	Possible, however site is cramped	None	Possible but may be limited By small size and location	Access issues. Impact on bats and SAC Heritage nearby. None of these are deal breakers. However, site is cramped and capacity for good quality development that would comply with CP57 is limited.
1040 54 Woodmarsh	Yes Close to settlement boundary and could meet local need.	Unknown in SHELAA.	Yes	1.12ha 34 30 dph	Yes.	Possible	None	Possible but may be limited By small size and location	Within built-up area of village and not within proposed landscape setting area. Could be considered in a future plan review.

Site	Positive SHELAA assessment? 'Suitability'	Positive SHELAA assessment 'Availability'	Positive SHELAA assessment 'Achievable'	Scale, Possible Dwelling Numbers and Density	Compliant with WCS Policies 1, 2, and 29?	Community Approval? (Community Engagement) Scale appropriate?	Conflict with which NDP Objectives?	Impact on Bats SAC? *	Local Issues and Constraints? Conditions necessary/ comments?
3565 'Southwick Court' (HSAP site H2.6).	Yes Meets Strategic need though development plan.	Unknown in SHELAA. Since confirmed available in HSAP	Yes	15.77ha 475* 30 dph	Yes. Provided for meeting strategic needs of Trowbridge in CP29	Possible	1 (but relatively minor)	Yes. Large scale and not for local needs.	Mainly out of the parish and with few local impacts. Careful landscaping, consideration of heritage and biodiversity essential. Enhancement of footpath network would have health and transport benefits.
Organ Pool Farm (Housing with shop).	No. Seems unsuitable due to policy conflicts: is outside village boundary, not a HSAP strategic site and is not for local needs.	No, but confirmed available by developer Dec 2017.	No	4.0ha approx. 120 30 dph	No. Outside settlement boundary. Not part of planned strategic growth of Trowbridge	No. Unlikely to pass referendum.	1, 2 (possibly 6 considering scale).	Yes. Large scale and not for local needs.	Site is too large to meet local needs yet is not a strategic site aimed at meeting needs of Trowbridge. Seems therefore inappropriate for village the scale of North Bradley which has limited facilities. Site is large enough to have potential to impact adversely on bats. Viability of proposed shop seems to open to question.

* As far as is known, no specific threshold has been established at which a specific size or density of development would adversely affect the SAC and bats. However, a common-sense view would be that larger scale schemes would be likely to have significantly more impact than small ones. The density and scale of development has been discussed with the County Ecologist. See Appendix 3. Rather than set a specific level therefore, the NDP balances the conservation of biodiversity and habitat against the over-riding government policy to deliver housing to meet local needs. Accordingly, small-scale, edge of settlement schemes aiming to meet local need are considered to be acceptable against this indicator, while those aimed at delivering strategic levels of development in the open countryside are not. The NDP also contains a policy requiring even these smaller schemes to be subject to policy 5 'Bat Conservation', and its requirement for an ecological report, to include assessment of likely impacts on bats and also any measures proposed to mitigate these.

3.26 **Commentary on initial range of sites set out in Matrix:**

The following expands on the entries in the above table and explains which sites were taken forward for inclusion at this initial stage (pre-public consultation and pre-Reg 14). Note that proposed HSAP sites are considered in order to assess whether the community could support them. However, the plan does not allocate these as they are taken forward by the HSAP.

Site	Comment
<p>298 HSAP Site H2.2 ‘Land off A 363 off White Horse Business Park’</p>	<p>The site is large in proportion to North Bradley, which is a rural parish. Schemes of this scale would normally fall foul of WCS Core Policies 1 and 2 but are permitted by virtue of Core Policy 29 which seeks strategic sites for Trowbridge. There are issues in terms of heritage, impact on neighbouring properties and transport. However, the most serious objections are Landscape and Biodiversity. The site as proposed in the draft HSAP would harm the landscape setting of the village, which the NDP, backed by a landscape report, seeks to protect.</p> <p>In terms of impacts on the SAC, the HRA for the HSAP stated: <i>‘Radio tracking studies have recorded at least one Bechstein’s bat from the Green Lane Wood complex both foraging and night roosting in woodland associated with White Horse Business Park to the rear of Drynham Lane Farm on the southern boundary of the site which could be impacted by development encroaching into this area and associated lighting. In addition, there are almost certainly strategic commuting routes through these options linking the Green Lane Wood complex and Picket and Clanger Woods with tree roosts to the northwest at Southwick and other Core Roosts west of the town. Much of the landscape south of the town has been significantly fragmented and degraded by urban development at White Horse Business Park, North Bradley, Yarnbrook and Southwick, and these allocations therefore represent two of the few dark areas of semi-natural habitat to provide an east-west link for bats moving through this landscape.</i></p> <p><i>Given that these options would cause coalescence of White Horse Business Park with Trowbridge and North Bradley, they have the potential to entirely sever potentially important east-west commuting routes on the southern edge of the town which link breeding roosts with the wider countryside and the SAC underground sites at Bradford on Avon and Bath. woodland belts associated with the White Horse Business Park, a strong network of hedgerows, and the farmland setting of Willow Grove, the latter of which could include tree roosts for Bechstein’s bats’</i></p> <p>While the HRA concluded that mitigation was possible for this site, the better option must clearly be not to develop the site at all but to leave it as open countryside.</p> <p>Do Not Allocate this site (But object to (as proposed) and oppose this site in HSAP Consultation)</p>

Site	Comment
322 Park Farm	Partial development of the site to meet local housing need could be acceptable. Although outside settlement boundary, this would comply with WCS policy if brought forward through the NDP*. Conflict with NDP Objectives could be minimised if well designed; access, recreation, drainage, neighbour amenity, biodiversity and heritage issues would need to be dealt with by a suitable scheme. If the interests of neighbours and the recreation area are to be protected then not all site is developable. Number of homes would also normally need to reflect Local Need in order to comply with which Core Policies 1 and 2 which limit growth in Large Villages. Nevertheless, allocate but limit to 30 units with the balance to be for new public open space and landscaped to benefit this and biodiversity. See below.
613 (HSAP Site H2.1 'Elm Grove Farm')	The most promising of the HSAP sites in North Bradley. Outside NDP landscape setting zone and with minimal conflict with NDP Objectives. Could produce sustainable development due to location on edge of Trowbridge. Would accommodate strategic growth proposed by WCS Core Policy 29 with minimal impacts on the parish. Do not Allocate as site being taken forward in HSAP (But support in HSAP consultation).
672 Paddock at Little Common Lane	A small site within the built-up area of the village. No conflicts with NDP Objectives or WCS Core Policies 1 and 2. However, site is very cramped and would be very limited in terms of capacity. Even a good design might struggle to comply with WCS Core Policy 57 and deliver a scheme in which the living conditions of residents would be acceptable in terms of privacy and amenity. Do not allocate but consider in review of plan if a suitable design complying with Core Policy 57 is put forward.
1040 54 Woodmarsh	May be suitable. Close to settlement boundary. Consider in future review. Do Not Allocate. Re-consider in any plan review.
3565 'Southwick Court' (HSAP site H2.6).	Large site, but may be acceptable, given location immediately adjacent to Trowbridge and distance from most of landscape protection area. Some impact does occur on proposed landscape setting area, but this may be acceptable in view of small area involved and strategic need. Do not Allocate as site being taken forward in HSAP (But support, subject to conditions in HSAP consultation).
Organ Pool Farm	Large site, outside settlement boundary and contrary to WCS policies 1 and 2. Too large to be for local need and yet not proposed as a strategic site for Trowbridge in the HSAP. Negative impacts on bats possible. Unlikely to be popular with the community. Conflicts with NDP Objectives 1, 2 and possibly 6. Do not Allocate.

* Core Policy 2 states: 'Other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans'.

3.27 **Interim Conclusion and Summary at this stage (Pre- Community Engagement)**

The NDP should respond to potential site on the following basis. Suitable sites are those that:

1. Are Suitable, Available and Achievable
2. Are a 'best-fit' with all relevant WCS Policy
2. Are the right scale to be appropriate for a Large Village and meet local needs over the plan period OR
3. Are strategic sites to meet the growth of Trowbridge (Not allocated, but taken forward by HSAP).
4. Conflict with the fewest NDP Objectives, including the Landscape Policy
5. Are likely to meet with community approval and pass referendum.
6. will have the least impact on Bats and the SAC (Bath and Bradford-on-Avon SAC), notwithstanding possible mitigation.
7. Have any other local issues that are capable of mitigation
8. Adequately provide for the needs of the area including building in flexibility and delivering sustainable development when weighed against other restrictive policies in the NDP. .

3.28 **Possible Site Allocations:**

The Plan does not seek to allocate sites being taken forward by the HSAP (Sites 298 H2.2, Site 613 H2.1 and Site 3565 H2.6). However, it does support two of these (Site 613 H2.1 and Site 3565 H2.6) for the reasons given above and opposes site 298 H2.2) which, as proposed, has unacceptable landscape setting and biodiversity impacts and discussed in the landscape report commissioned for the NDP. This opposition will be made clear to the LPA, Wiltshire Council.

3.29 Of the remaining sites, 1040, 'Woodmarsh' is not available, but could be suitable and can be the subject of investigation in a review of the plan. 672 'The Paddock' has layout difficulties that will make a good quality scheme difficult to achieve. It is therefore not allocated, but again, could be reviewed in a future version of the NDP should an ingenious and acceptable scheme come forward. Organ Pool Farm is outside the settlement boundary and is too large to meet local need. It is not a strategic site brought forward through the development plan process and is therefore in conflict with WCS Core Policies 1 and 2. The site could also have a negative impact on Bats and the SAC as it protrudes far out into open country away from existing buildings.

3.30 **322 Park Farm** is on the edge of the settlement and outside the proposed landscape protection area proposed by NDP Policy 1. Although outside the settlement boundary it would be acceptable in policy terms if brought forward via an NDP, thanks to the provision in WCS Core Policy 2. There may be impacts on bats, however if the developed area and numbers permitted are reduced this could be minimised. The site is also surrounded or partially surrounded by development which is lit at night on three sides, so impact is likely to be less than a site which protrudes more into the open landscape.

3.31 Park Farm has a number of issues to be dealt with and these could be the subject of conditions within any allocation policy. These include:

Access to be resolved – if existing recreation area is lost then this would have to be replaced within the site. An upgrade to size and facilities of the recreation area would also be expected to cope with increased numbers of residents from the development.

Amenity of neighbours. A buffer zone of landscaping and trees would be required between the new development and the existing properties around the site. Additionally, the rear gardens of the new properties should face the existing back gardens of established homes to provide greater separation, ensure privacy and reduce noise nuisance.

Heritage: the settings of existing buildings built before 1918, such as Broadleigh House, whether listed or not, should also be respected and enhanced if possible. This concerns proximity and scale of new buildings, their landscaping and materials from which they are constructed. An evaluation for archaeology should be carried out if required by the LPA.

Biodiversity including Bats.

Any allocation policy should expressly state that any development of the site should protect and if possible enhance any habitat features, especially those related to the SAC. In particular, existing hedgerows should be enhanced, new ones provided, and native species of trees planted. The buffer zone required for adjacent properties could also be designed to benefit biodiversity. Provision should be made for re-planting if these fail with the first year. This will also visually soften the scheme and emphasise the rural location. Such a policy should also include a commitment to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy and a requirement for a site specific HRA.

Hours of Construction: In order to safeguard the amenity of existing properties, which surround the site. Construction hours must be limited to normal weekday working hours.

3.32 Numbers:

The potential capacity of the site is 94 units, based on a crude calculation that uses the entire site area, and takes no account of the need for access roads, recreational space or landscaping. This number is also far more than required to meet local need as set out in section 2 of this report, which envisaged, at this stage of the SSR, a requirement for around 15 new homes and would be unlikely to be acceptable to the community. Nevertheless, the NDP has to operate in the world in which it finds itself and not an ideal one. Park Farm emerges from the site selection process as the best site.

3.33 It would of course be possible not to allocate any sites at all. However, such a course could lead to the failure of the entire Neighbourhood Plan. The reason for this is that the flagship policy of the NDP, Policy 1, attempts to establish a buffer or landscape protection zone between Trowbridge and North Bradley. Were the plan to maintain such a restriction without correspondingly balancing this by allocating housing sites elsewhere, then it would be unlikely to be seen to be 'planning positively' as required by government guidance or to be delivering 'sustainable development' – one of the 'Basic Conditions' with which all neighbourhood plans must comply. To fail to meet one of the Basic Conditions would result in the plan failing at Examination.

- 3.34 It follows therefore that the plan should present a balanced and carefully considered approach, in which environmental protection is balanced with the need to deliver housing. As such it seems sensible to look carefully at the Park Farm site to see if a smaller scheme could be delivered that would do this while remaining acceptable to the community. This could be done by accepting limited development on the site. On the other hand, it is recognised that development must not be so restricted that it would affect viability.
- 3.35 There are in any event, sound reasons why the full site should not be developed to the maximum yield of 94 homes:
- i. The need to minimise disturbance to bats and the SAC. This may involve the creating of dark-corridors and more landscaping than most new schemes. Precise details could be worked out by dialogue between a developer and the LPA's Ecologist, but would certainly reduce the development potential of the site.
 2. The need to set development back from existing properties in order to protect the amenity of existing residents and to ensure that new residents have good quality of life in accordance with CS Core Policy 57.
 3. The need to add either a new recreation area should the existing one be used for access or to add additional recreational space for the increase in population resulting solely from the new scheme.
 4. The desire of the community to improve biodiversity and created enhanced habitat presents the opportunity to create a new park, with hedgerows and trees and perhaps a small pond.
- 3.36 Accommodating the above has the following general implications for capacity. These calculations are crude and for the purposes of an indicative assessment only, and with the realisation that they will be used for public consultation including with the site owner.
- i. Recent HRA's for nearby developments (e.g. 17/03269/OUT.) have indicated the potential for disturbance from medium-scale developments to bats and the integrity of the SAC. A mediation strategy is being developed by Wiltshire Council. Mediation measures in such cases include leaving 'dark corridors' of unlit landscaping and planting screening vegetation. Until a general Trowbridge Bat Mitigation strategy is published by Wiltshire Council, there is no indication of how much area this might require, however for the sake of argument, this report proposes a modest reduction of 10% and leave actual calculations to be made at the planning application stage. A 10% reduction in useable area would be 0.3ha.
 - ii. Creating a landscape buffer of 20m wide by 315 metres long (the approximate average length of the site) would reduce the useable site area by 0.63ha.
 - iii. Replacing the recreation area would require approximately .675ha of space
 - iv. Adding an enhanced habitat of tree-rich parkland and small pond could add 0.50 ha

3.37 Adding the four numbers above together: 0.30ha + 0.63 + .675ha + 0.50 ha would require a total reduction of 1.95ha in gross site area to produce a rough developable site area.

Present gross site area	3.14 ha
Less indicative reductions	2.11 ha
Net indicative developable area	1.03 ha

At a typical development density, this would indicate a scheme of around 30 homes. Notwithstanding these calculations it is unlikely that the community would in any case support a higher number of homes.

3.38 Site Allocation Draft Conclusion (pre-community engagement):

This draft site selection report proposes for consultation that the following non-HSAP sites are rejected for taking forward in this, the first North Bradley Neighbourhood Plan*, for the reasons given above:

- 672 Paddock at Little Common Lane
- 1040 54 Woodmarsh
- N/A Organpool Farm

In terms of the strategic HSAP proposals:

613 (H2.1) 'Elm Grove Farm' and 3565 (H2.6) 'Southwick Court' are unopposed, since impacts on the parish will be relatively minor and must be balanced against the strategic need to accommodate the growth of Trowbridge. They will be taken forward via the HSAP process and not the Neighbourhood Plan. Site 3565 (H2.6) 'Southwick Court' would require minor modification to the proposed landscape setting gap, but this could be accommodated as the size is small.

Strategic HSAP Site 298 (H2.2) 'Land off A 363 near White Horse Business Park' is however directly in the landscape gap and the proposed developed area comes uncomfortably close to the village. It could lead to the coalescence of Trowbridge and North Bradley. It is opposed, subject to further dialogue with Wiltshire Council.

The one remaining site is 322, at Park Farm. This site is the most suitable site, judged against the criteria in the site selection matrix. However, it would be too large to meet purely local needs and might not be acceptable to the community if developed to the full. However, a reduced capacity site, featuring extensive landscape enhancement and new recreational space might be acceptable, while still leaving sufficient development potential to ensure the viability of a good scheme. Inclusion of the site would also balance the restrictions imposed by the landscape protection policy (NDP Policy 1) and so deliver a plan that plans positively and would be likely to deliver sustainable development.

* It is possible that 672 and 1040 could be considered in a review, later in the life of the plan.

3.39 At this point (prior to community engagement) , it is therefore proposed to allocate the Park Farm site for up to 30 homes subject to a scheme including:

- 30% affordable homes (9 in total) to include some subsidised homes for purchase (1 and 2-bedroom homes).
- Satisfactory access to be confirmed
- Protection of existing properties through creation of a buffer strip and appropriate landscaping
- Appropriate provision for recreation
- Enhanced habitat for nature including a park area with trees, hedgerows and pond
- Appropriate mitigation for the SAC and bats (to be confirmed via Wiltshire Council's emerging Mitigation Strategy)
- Scheme design to conserve or enhance the setting of Broadleigh House
- Control of construction hours to reflect proximity of existing homes

3.40 These draft allocations in the SSR were subject to community engagement before becoming part of the Regulation 14 draft plan. It should therefore be regarded a part of the on-going dialogue between the Steering Group and the community, including developers; a position statement, subject to further discussion and refinement prior to inclusion in draft policy.

4.0 Analysis and Summary after Community Engagement and SEA Screening

4.0 The site selection 'story' of the NDP continued with community engagement on the draft proposal given at the end of Section 3. Sites community engagement was undertaken by the Steering Group in March 2018 on a draft Site Selection Report (SSR) (effectively Sections 1-3 above). This is recorded in the separate and accompanying Consultation Statement (CS). Minor alterations were then made to sections 1-3 of this report and Sections 4 and 5 added to complete it.

4.1 Community engagement on the draft SSR took the form of a questionnaire and several drop-in events. The results of the community engagement are recorded in detail in the CS, but the summary can be repeated here to avoid cross referencing.

4.2 **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 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. These numbers were generally above those indicated as necessary to deliver local need in the HNS.

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.

4.3 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.

4.4 **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.

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 is 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 (proximity) 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. While the HNS had indicated 10 homes as being necessary to allocate in order to meet local need, and while at that stage (section 3) a buffer of 100% was added to suggest a level of 20 homes might be necessary to meet local plus market needs, the public consultation on sites indicated that a higher number could be acceptable. The exact number would however depend on the sites actually available and their capacities.

4.5 Scoring of draft SSR Sites

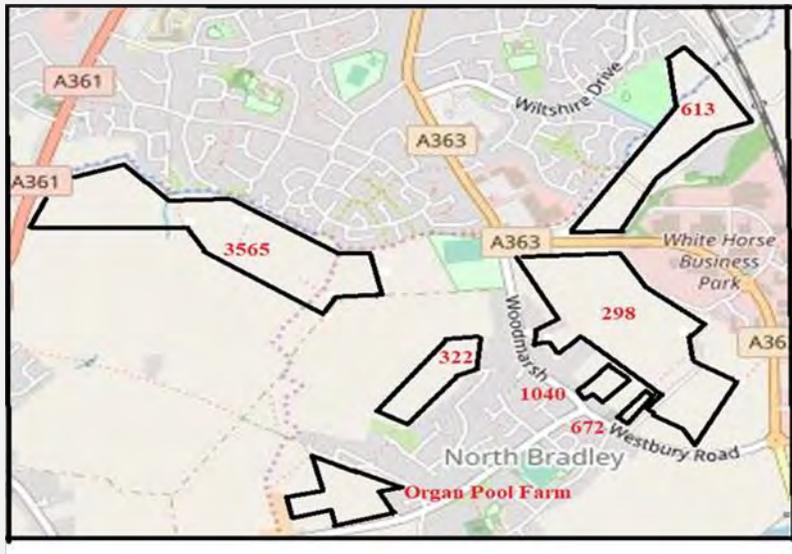
The scores for the sites were as follows, most popular first:

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.

4.6 Draft SSR Sites (comments on individual sites):

Question 4 of the questionnaire plus drop in event comments



Map from 'Open Street'.

- 4.7 **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.
- 4.8 **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.
- 4.9 **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.
- 4.10 **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.
- 4.11 **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.
- 4.12 **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 green fields 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). It was decided to consider this matter carefully.
- 4.13 It seemed clear that most residents would oppose an access through Oak Drive and investigations confirmed that the land required is registered as a Village Green. The site would only be acceptable therefore if access could be achieved via Park Farm or through the existing hammerhead at Orchard Way.
- 4.14 If access were not to be via Oak Drive then this would remove the need for an area to be provided as compensation for lost recreation space, thus freeing up 0.675 hectares (see paragraph 3. 36 in the pre-consultation part of this report above). This would create a developable site area of 1.705 hectares allowing the site capacity to rise to an indicative figure of 52 homes.

4.15 **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 agent for the developer wanting to develop this site contacted the Steering Group during community engagement on the draft SSR and this communication is given as an Appendix in the Consultation Statement.

4.16 **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 was surveyed in May 2018 by Steering Group volunteers. (see appendix 10 using the same forms as the original site survey and with the supervision and input of the planning consultant.

- 4.17 Suitability: The site is suitable for development if brought forward through a neighbourhood plan (e.g. it complies with WC Core Polices 1 and 2)
Availability? Yes (confirmed by Owner)
Achievable ? (Yes in terms of general viability – based on Wiltshire Local Plan Viability Study 2014 and HSAP topic paper 5 – Viability)

4.18 Discussion:

The site is very close to an area in Flood Zone 2, but is itself in Flood Zone 1. It is outside the settlement boundary of North Bradley and outside the settlement boundary proposed in the HSAP site boundary review. However this policy obstacle could be overcome if allocated in an NDP. The site is well related to existing development and public transport links, there is a petrol station with shop close by.

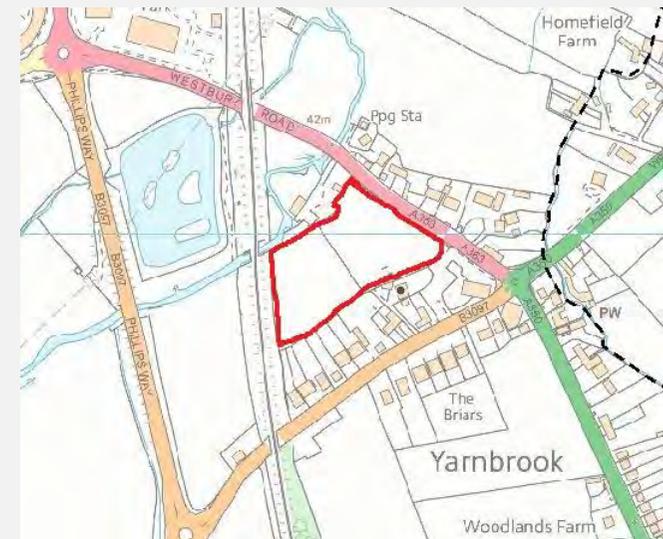
- 4.19 In addition to the above, concerns with this site relate to four main issues:

Site Access would probably be via a two-way in / out junction off the new roundabout. This would need to be agreed by any developer with those planning and constructing the new relief road.

4.20 **Quality of Life for residents.**

A scheme at this location would create a relatively dense area of housing completely surrounded by several sources of noise, vibration and air pollution, namely the railway line and surrounding roads, including the very busy A 350 and the congested Westbury Road.

However, a similar scheme has been approved further down the A350 at Westbury. Subject to reducing the capacity of the site in terms of homes, sufficient mitigation should be possible.



4.21 **Scale**

The figures submitted by the owners suggest an ambition for up to 62 homes. This is considered to be too large based on community preferences and on what the site could comfortably accept if reasonable life quality for new residents were to be possible.

4.22 **Other impacts**

Development at this location should not result in the net removal of trees or hedgerows, indeed habitat should be enhanced if possible. Impact on the setting of non-listed heritage assets and the local street scene would need to be considered. For these reasons, it is proposed to allocate this site but for an indicative limited scheme of 22 homes only.

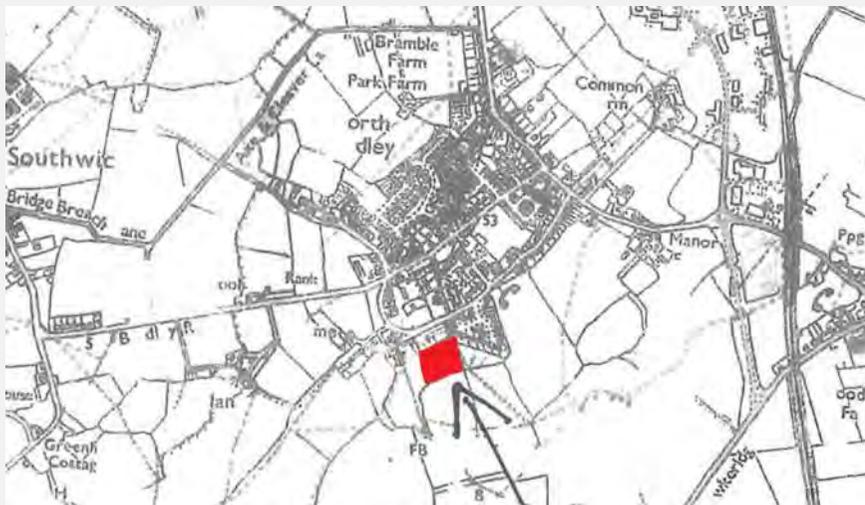
4.23 **Land off Church Road.**

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

4.24 Suitable ? No (see below)

Available ? Yes (confirmed by Owner)

Achievable ? (Yes in terms of general viability - based on Wiltshire Local Plan Viability Study 2014 and HSAP topic paper 5 – Viability)



4.25 **Discussion**

The site is located outside the settlement boundary and in Flood Zone 1. It is well related to the built up area of the village. The size indicated a theoretical capacity of around 35 units.

4.26 However the access suggested is via a narrow track exiting opposite the Church of St Nicholas. Permission for a much smaller development using this access was refused on 20th May 2003 W/03/00518/OUT on highway grounds. This refusal was subsequently upheld at appeal on 18th February 2004 (APP/F3925/A/03/1132660). The main issues were substandard visibility and safety concerns. On this basis the site cannot be regarded as suitable.

4.27 New Sites Summary Table (Post-community engagement)

Site	Positive SHELAA assessment? 'Suitability'	Positive SHELAA assessment 'Availability'	Positive SHELAA assessment 'Achievable'	Scale, Possible Dwelling Numbers and Density	Compliant with WCS Policies 1, 2, and 29?	Community Approval? (Community Engagement) Scale appropriate?	Conflict with which NDP Objectives ?	Impact on Bats SAC? *	Local Issues and Constraints? Conditions necessary/ comments?
Land off Westbury Road, Yarnbrook	N/A But is suitable – see above	N/A But is available – see above	N/A No, but is achievable – see above	Only limited scheme likely to deliver good life quality. 22 Homes	Yes if brought forward via an NDP and if CP 57 is applied with care	Possible as this would increase number of sites delivered without a major scheme being needed.	No	Possible – meeting needed with Wiltshire Council Ecologist	Careful design required to ensure life quality of residents.
Land off Church Road.	N/A But unsuitable – see above	N/A But is available – see above	N/A No, but is achievable – see above	35?	Yes if brought forward via an NDP. Possible conflict with transport policies.	Considerable objections to past applications nearby indicate that acceptance unlikely.	Possibly 3	Possible	Poor and dangerous access

4.28 **General Conclusions from Community Engagement**

The sites community engagement confirmed a number of themes that had already emerged from earlier research and engagement. The primary objective for many residents was clear; to preserve a credible rural setting to North Bradley and avoid the loss of character that would result were coalescence allowed to occur between North Bradley and Trowbridge.

4.29 The Steering Group knew that by far the most logical and effective way to achieve this was through a neighbourhood plan with a landscape policy underpinned by professional study and evidence. It was for this reason that the decision had been made, prior to the SSR, to commission a landscape architect and devise a policy based on their report to achieve this most important task. The policy forms Policy 1 of the emerging draft NDP. However, in order to be effective, such a policy has to be in a plan that will pass Examination. This means that it must follow neighbourhood planning regulations, planning policy and government advice. In particular no plan at all would be possible without complying with the following:

4.30 **The need to be ‘in general conformity with the Development Plan’** (This is one of the ‘Basic Conditions’ required by paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004). The Wiltshire Core Strategy forms part of the development plan and while Core Policy 2 limits growth in North Bradley to that for ‘local needs only’, Core Policy 29 makes clear that strategic housing need in Trowbridge must also be taken into account (the policy states that an additional 950 homes must be provided). Wiltshire Council has taken this forward in the HSAP and allocated three sites in the parish. The community engagement shows that the community is accepting of two of these (HSAP H2.1 and H 2.6) but is concerned about SHELAA 298 (HSAP H2.2 – Land of White Horse Business Park)) which would effectively link Trowbridge and North Bradley. Were this site to remain undeveloped as the community wish, without an alternative being suggested, this could effectively mean that the NDP would be hampering the delivery of a strategic policy of the WCS, something that is expressly forbidden by Planning Practice Guidance.

4.31 **The NPPF requires neighbourhood plans to ‘plan positively’** in taking forward the overall planning strategy for the area. It is acceptable, where a plan such as the HSAP is at draft stage, to suggest alternative sites (PPG 044 Reference ID: 41-044-20160519). However, were the NDP to simply block delivery of the proposed HSAP site H 2.2 *but fail to address the issue of need in Trowbridge through other sites of its own*, then it is likely that a planning Examiner would conclude that the North Bradley neighbourhood plan was not ‘planning positively’ as required by the NPPF. Clearly, consideration of the need for Trowbridge as well as the local need shown in the HNS is required and the number of homes provided, while not necessarily being as high as suggested in the HSAP, would have to be meaningful. Full realisation of this by the Steering Group occurred during the community engagement and analysis of results.

4.32 **Delivering Sustainable Development.** It is one of the ‘Basic Conditions’ (see above) that all plans must pass that a neighbourhood plan must help to deliver ‘sustainable development’. The possible definitions of sustainable development are open to a degree of interpretation, but broadly speaking the concept includes the idea of balancing humans needs with environmental impacts. A balanced plan is therefore what examiners are likely to be looking for. It is unlikely that the North Bradley Neighbourhood Plan would be able to deliver sustainable development if it planned on the one hand to protect a large area of open space as a landscape gap, while not providing people with enough homes to live in in future years on the other.

4.33 **Difficult decisions**

It has become clear during the site selection process that there could be a conflict between the wishes of the community (in the creation of a landscape setting 'gap' between North Bradley and Trowbridge) and the ambitions of Wiltshire Council's HSAP, most particularly site 298 H2.2. Following community engagement, the Parish Council, supported by two Wiltshire Councilors, presented an argument to Wiltshire Council's Cabinet that, if the site could not be avoided, then it should be reduced in size and a landscape buffer created to ensure that North Bradley remained separate from Trowbridge. The Parish Council, the County Ecologist and the Landscape Architect working for the Steering Group discussed possible site layouts at meetings and via e-mails in August and September 2018. Ultimately it was agreed that the proposed HSAP site would be reduced in size from a level of 225 units (proposed in the draft HSAP) to 175.

4.34 Before a meeting, which took place on 14th August at County Hall, the Landscape Architect working for the group outlined three options in separate plans. Following the meeting, which was attended by the County Ecologist and the Landscape Architect, Option 3 was selected and this is given below. This option groups the development in such a way that a meaningful separation remains between North Bradley and Trowbridge and an adequate and appropriately landscaped habitat (including a 'dark corridor') remains for the bats.

4.35 At the meeting the County Ecologist also ruled out the potential site at 'Land Off Westbury Road, Yarnbrook', due to the likely impact on bats from the SAC. This was considered to be an objection carrying significant weight and it was decided to drop this site from consideration.

4.36 The final recommendation of this report, after many twists and turns described in preceding sections, is therefore based on the strategy of creating a workable plan. To a certain extent this means making the best of the situation as it is rather than as one would wish it to be. A more positive way of looking at it would be to say that a balanced plan will preserve the village identity of North Bradley and protect as much of the green fields between it and Trowbridge well into the future, at a price in terms of a housing quantum less than would have been the case with no plan at all. A significant number of consultation responses mentioned infrastructure, and it is worth noting that with a neighbourhood plan, the community would benefit from an uplift in income from the Community Infrastructure Levy, meaning that every house built would contribute towards the infrastructure aims identified by the community in the draft neighbourhood plan including:

- Improvement of existing footpaths including the introduction of crossings, dropped kerbs and smoother surfaces suitable for electric buggies as well as pedestrians.
- The installation of cycle paths linking the parish with Trowbridge
- Improvement of local bus services
- Upgrading of recreational and other facilities at the Peace Memorial Hall and the Progressive Hall
- Provision of health care facilities within the parish
- The provision of a new non-denominational burial ground.

4.37 **Site by site analysis updated following community engagement**

Once a draft plan was ready containing sites selected on the basis of the above analysis, it was submitted for SEA and HRA Screening to the LPA, Wiltshire Council. Wiltshire Council issued a draft Screening Decision in June 2018. This concluded that an SEA and HRA (and AA or 'Appropriate Assessment') would be required, primarily because the NDP allocates sites for housing and these could have impacts on heritage and the Bath and Bradford on Avon SAC. The specific impacts identified in the Screening are as set out below. The main effect on the SSR and NDP was to cause the Steering Group to drop The Paddock site from the plan due to concerns over its cramped nature and the difficulty in achieving a practical design that would not impact adversely on heritage assets.

Comment: **The Paddock** site is cramped and it would be difficult to achieve a satisfactory design without compromising nearby heritage assets. Is this possible?

Response: It was decided to drop this site from the draft plan. It could be reconsidered at a future plan review. (Decision also based on SEA screening responses from Historic England and LPA's Conservation officer – see below)

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 and 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. FRA may be required at application stage to inform design. However, site will be dropped due to likely impact on bats / SAC.

Comment: Possible impact on non-listed heritage assets

Response: Include mention of need to take account of in design of any proposals
Site will be dropped due to likely impact on bats / SAC.

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

Response: Noted. Site at Westbury Road, Yarnbrook dropped on advice of County Ecologist

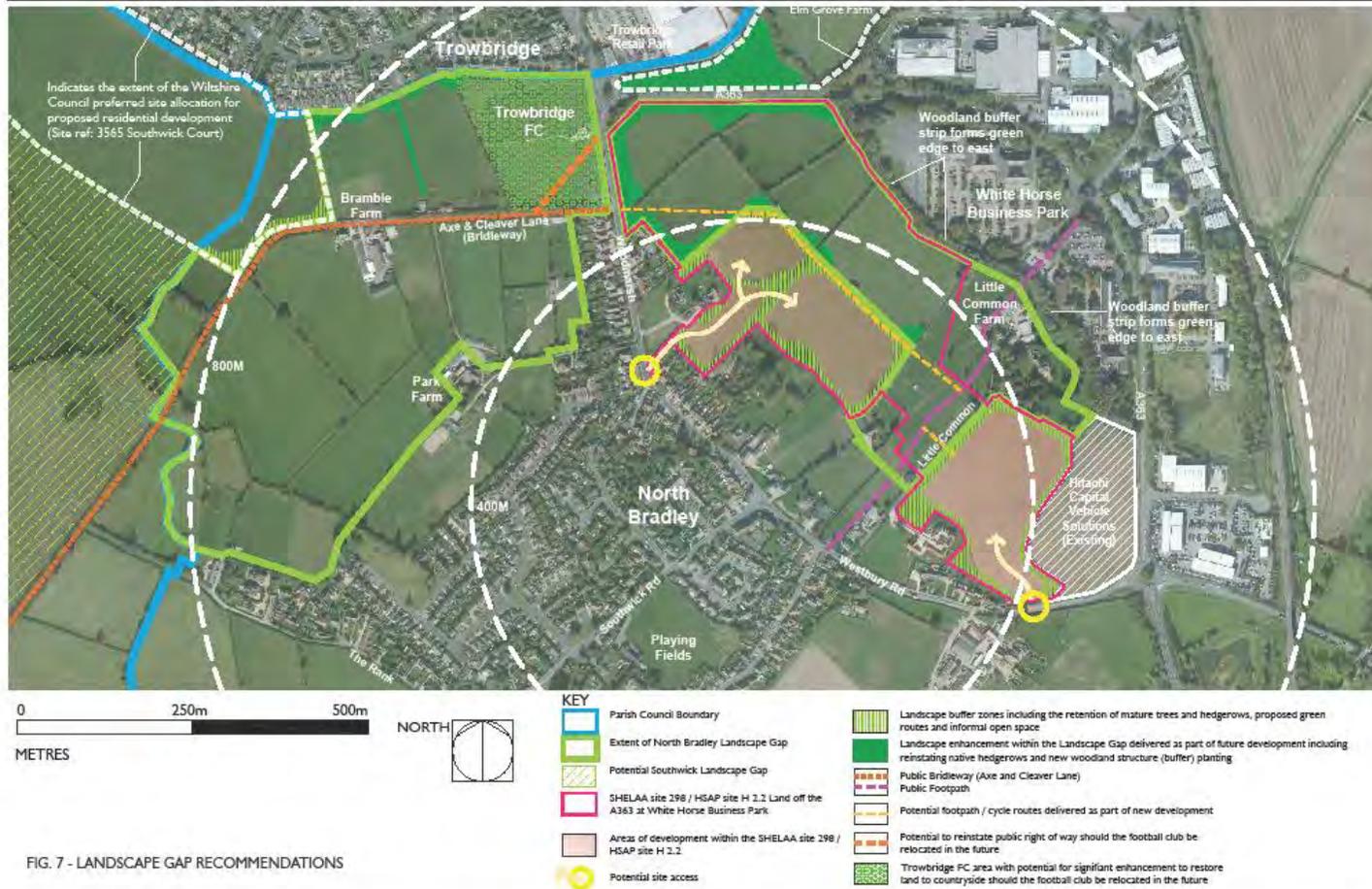
Land off White Horse Business Park

Site	Comment
<p>298 HSAP Site H2.2 'Land off A 363 off White Horse Business Park'</p>	<p>The site was not popular with the local community and conflicted with the Landscape and Visual Analysis Report produced by the NDP's Landscape Architect. However, it is a strategic proposal made by the planning authority, Wiltshire Council, likely to carry significant weight with an Examiner. Should the NDP oppose this then it could be found to fail one of the Basic Conditions and be rejected at Examination. In fact, while the site's impact on the landscape setting of North Bradley was originally considerable, this has been reduced very much through prolonged negotiation between the Steering Group and Wiltshire Council. This negotiation has resulted in a reduced number of homes and an extensive green barrier between Trowbridge and the village of North Bradley. While this has not fully met the original ambitions of the NDP in terms of its overall landscape gap approach, it is considered to be acceptable.</p> <p>Location The site is outside the settlement boundary and is in Flood Zone 1</p> <p>Landscape Impact / Scale The site is large and would cause significant harm to the landscape setting of North Bradley as originally proposed. As such it would conflict with the proposed NDP Policy 1 which aims to create a landscape gap or buffer between the village and Trowbridge. The importance of this rural setting and separation was emphasised in the sites community engagement. Nevertheless a revised site plan based on a smaller scheme has been negotiated which accommodates this strategic site while creating a more substantial landscape gap.</p> <p>Community Support Providing the reasons for accepting the site are explained (i.e. the fact that it cannot be realistically opposed and has been greatly mitigated by the NDP) it is considered that the site should be acceptable to a majority in the community.</p> <p>Biodiversity The proposed reduction in size and the greater landscape gap achieved will also provide a Dark Corridor for the bats – benefitting biodiversity over the original scheme.</p> <p>NDP Objectives The site is considered to have moderate conflict</p> <p>Do Not Allocate (But accommodate within the Landscape Policy (Policy 1) subject to detailed layout and landscaping</p>

HSAP site H 2.2, SHELAA 298: Land off White Horse Business Park – Layout Proposals and Overall Landscape Gap

LANDSCAPE & VISUAL SETTING ANALYSIS PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE

INDIGO



I N D I G O L A N D S C A P E A R C H I T E C T S L I M I T E D

4.38 Park Farm

Site	Comment
<p>322 Park Farm</p>	<p>Location The site is outside but immediately adjacent to the settlement boundary. It is in Flood Zone 1.</p> <p>Landscape / Scale The site would not impact on the proposed landscape ‘gap’ between North Bradley and Trowbridge or adversely affect the wider landscape setting of the village (see Landscape Setting and Visual Analysis report) . The scale is moderate if the development is limited to part of the site.</p> <p>Neighbours If the interests of neighbours are to be protected then not all site is developable. In particular a landscape buffer strip will be required.</p> <p>Access During the community engagement, accesses to the site were considered in more detail. Representations pointed out that access via Oak Drive would be over an area registered as a village green and contains mature trees, something that would not be acceptable to the community. Access via Park Farm / Woodmarsh would probably be too cramped. However, access was possible via the hammerhead in Orchard Way. This would remove the need for compensatory recreational space to be provided.</p> <p>Pedestrian and cycle access could be provided across the site to make a route to Woodmarsh and give better access to the Woodmarsh bus stops from Orchard Way. and cycle route to Trowbridge.</p> <p>Biodiversity Possible impacts on SAC – likely to be mitigatable based on advice from the County ecologist</p> <p>Community Support While not immediately popular during the sites community engagement, the site has the potential to deliver housing. Popular support could be much higher if it was better understood how the site could, as part of an overall strategy help to preserve the landscape gap between North Bradley and Trowbridge. Awareness raising as to this point is a key aim of the draft NDP and Regulation 14 Consultation to come.</p> <p>NDP Objectives Conflict with NDP Objectives is minimal and could be reduced if well designed; access, recreation, drainage, neighbour amenity, biodiversity and heritage issues were dealt with by a suitable scheme.</p> <p>Allocate for an indicative number of 35 homes, subject to conditions including access. The number of dwellings has been increased slightly over the original intention in order to help the plan provide a viable alternative strategy to the HSAP as described in paragraphs 4.27ff of this report. Make subject to Mitigation for impacts on Bats / SAC.</p>

4.39 **Elm Grove Farm**

Site	Comment
<p>613 (HSAP Site H2.1 'Elm Grove Farm')</p>	<p>The site is supported by the NDP on the following grounds:</p> <p>Location The site is immediately adjacent to Trowbridge and is in Flood Zone 1.</p> <p>Landscape / Scale Scale is very large, but the site reads as part of Trowbridge, and impact on the separation, rural setting and local distinctiveness of North Bradley is likely to be minimal.</p> <p>This is the most promising of the HSAP sites in North Bradley. Outside NDP landscape setting zone and with minimal conflict with NDP Objectives. Could produce sustainable development due to location on edge of Trowbridge. Would accommodate strategic growth proposed by WCS Core Policy 29 with minimal impacts on the parish.</p> <p>Community Support The sites community engagement indicated that this was likely to be acceptable to the community.</p> <p>NDP Objectives There are no fundamental conflicts with NDP Objectives as described in the tables of Section 3 of this SSR.</p> <p>Do not Allocate as site being taken forward in HSAP (But support in HSAP consultation)</p>

4.40 Paddock at Little Common

Site	Comment
672 Paddock at Little Common Lane	<p>The site was supported by the NDP on the following grounds:</p> <p>Location This is a small site of approximately 0.6 hectares, which, although outside the settlement boundary is nevertheless very close to the built-up area of the village. It is in flood zone 1. However the site is narrow and would make a good design difficult to achieve.</p> <p>Landscape / Scale The scheme would be of modest scale and would not impact on the rural setting of the village or the maintenance of a landscape gap between North Bradley and Trowbridge.</p> <p>Biodiversity Possible impacts on SAC – likely to be mitigatable based on advice from the County ecologist</p> <p>Heritage – Initial concerns over heritage assets nearby were confirmed during SEA Screening (July 2018). The LPA stated: ‘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’.</p> <p>Historic England had, during the SEA Screening consultation commented: ‘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.’</p> <p>The heritage context was re-examined and was found to contain 4 listed structures close to the site: King’s Farmhouse, Willow Grove. Gateway to burial ground of former Baptist chapel and two monuments in burial ground of former Baptist chapel.</p> <p>Without further evidence (e.g. a propose site layout and design / mitigation proposals) it was decided that the site could not be allocated. It could be re-considered in a further plan review if this information became available.</p> <p>Community Support While the site is cramped, it does have some community support.</p> <p>NDP Objectives There are no fundamental conflicts with NDP Objectives as described in the tables of Section 3 of this SSR.</p> <p>Do not allocate due to concerns about heritage impacts and design limitations of site layout.</p>

4.41 **54 Woodmarsh**

Site	Comment
<p>1040 54 Woodmarsh</p>	<p>During consultation, the landowner was contacted, and he stated that, contrary to the SHELAA, the site WAS available for development.</p> <p>Location / Landscape / Scale The site is located close to the settlement boundary in Flood Zone 1 and would 'read' as part of the existing village if developed (i.e. it would integrate well). There would be no conflict with the desire to preserve a landscape Gap between North Bradley and Trowbridge.</p> <p>The site is modest in size at just over a hectare in size and could theoretically accommodate up to around 30 homes. However, the need to screen and separate existing properties from new development with buffer zones and extensive landscaping and also to shield new properties from noise from events at the Progressive Hall, would significantly reduce this capacity – perhaps to an indicative 24 units.</p> <p>Access is possible via Woodmarsh Road, however proximity to the roundabout junction with Southwick Road would mean that satisfactory highway access would need to be agreed with the Highways Authority and this could involve additional works.</p> <p>Biodiversity Possible impacts on SAC – likely to be mitigatable based on advice from the County ecologist</p> <p>Community Support The site was the most popular non-strategic site and can therefore be considered to have community support.</p> <p>NDP Objectives There are no fundamental conflicts with NDP Objectives as described in the tables of Section 3 of this SSR.</p> <p>Allocate this site subject to an indicative site capacity of 25 dwellings. Make subject to Mitigation for impacts on Bats / SAC</p>

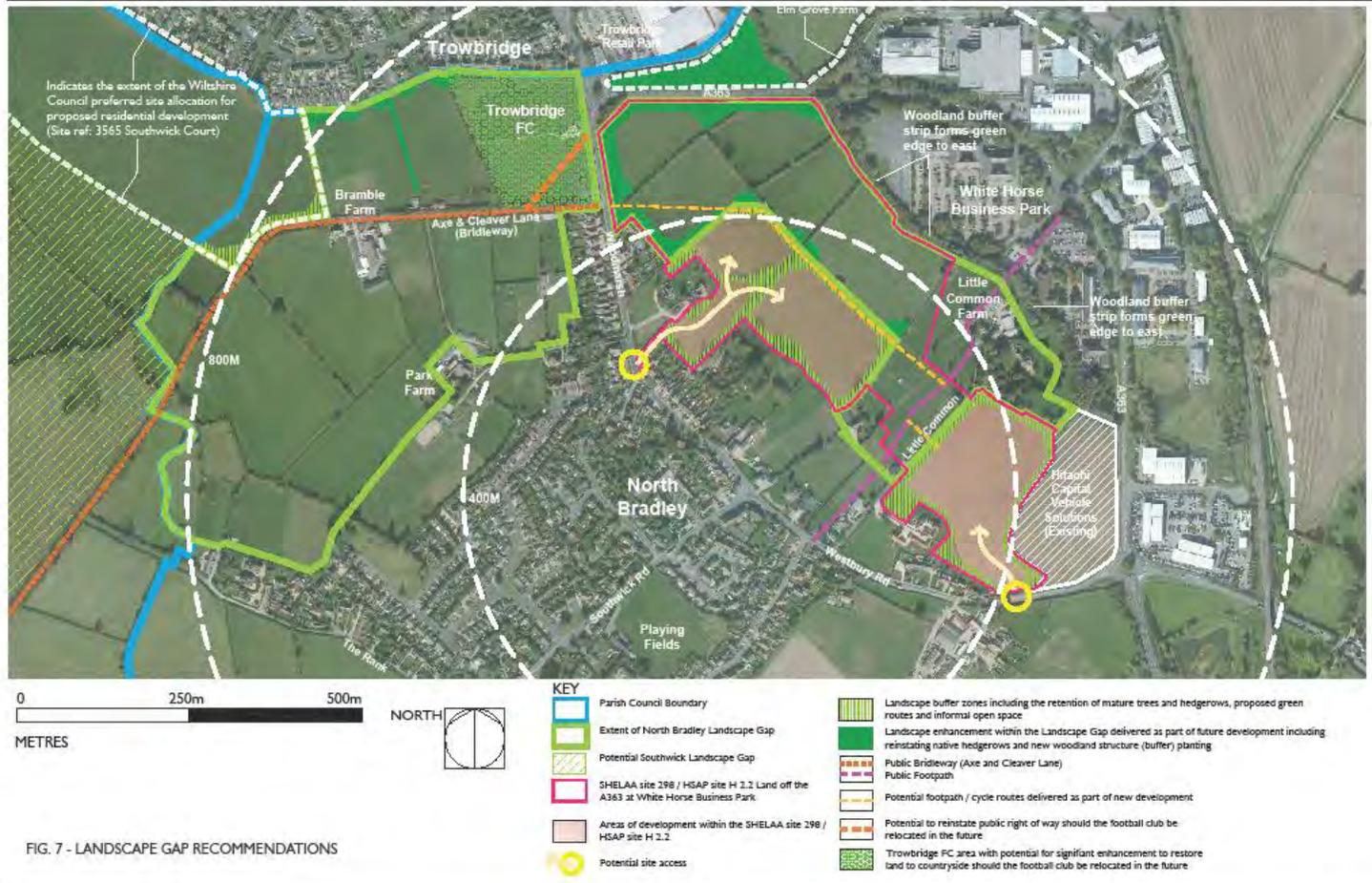
4.42 Southwick Court

Site	Comment
<p>3565 'Southwick Court' (HSAP site H2.6).</p>	<p>The site is supported by the NDP on the following grounds:</p> <p>Location Site is outside Settlement Boundary. Partially in flood Zones 2 and 3 (mainly Zone 1).</p> <p>Landscape / Scale Large site, but may be acceptable, given location immediately adjacent to Trowbridge and distance from most of landscape protection area. Some impact does occur on proposed landscape setting area, but this may be acceptable in view of small area involved and strategic need. This would be a sacrifice made to help meet strategic needs in Trowbridge.</p> <p>Community Support During the community engagement there was some support for this site.</p> <p>NDP Objectives There is some minor conflict with NDP Objectives in terms of location / landscape. However this is minor and can be accepted in the interests of planning positively to help meet strategic need in Trowbridge.</p> <p>Do not allocate as site being taken forward in HSAP (But support, subject to conditions in HSAP consultation).</p>

4.43 Because it was decided to formally accept the site 3565 H2.6 the landscape map produced to support policy 1 (Landscape Gap) was revised to exclude the site area from the proposed landscape protection area. The revised map was added to the NDP and is given below.

4.44 Revised map excluding site 3565 H2.6 from landscape protection area.

LANDSCAPE & VISUAL SETTING ANALYSIS
PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE



4.45 **Organpool Farm: The site is not supported by the NDP on the following grounds:**

Site	Comment
Organ Pool Farm	<p>Location The site is outside the settlement boundary and in Flood Zone 1.</p> <p>Landscape / Scale The site is a large one in open countryside, outside the settlement boundary yet is not part of the HSAP's planned approach to meeting strategic need. There would however be no effect on the landscape between North Bradley and Trowbridge.</p> <p>Lack of Community Support The site was clearly unpopular in the community engagement and a plan containing it would be unlikely to pass referendum.</p> <p>NDP Objectives Conflicts with NDP Objectives 1,2 and possibly 6 (due to scale) Do not allocate.</p>

4.46 **Land Off Westbury Road, Yarnbrook**

Site	Comment
Land Off Westbury Road, Yarnbrook	<p>Location Is outside existing settlement boundary in Flood Zone 1. Flood Zones 2 and 3 are nearby. An FRA could be required.</p> <p>Scale / Landscape Scale, if limited to 22 homes, is moderate and location would not compromise rural setting / landscape gap between North Bradley and Trowbridge. An adequate scheme could be achieved if the life quality of residents is carefully considered at the design stage.</p> <p>Biodiversity Negative impacts on SAC – not likely to be mitigatable based on advice from the County ecologist</p> <p>Community Support Possible.</p> <p>Access / Congestion. Site Access would probably be via a two-way in / out junction off the new roundabout. This would need to be agreed by any developer with those planning and constructing the new relief road.</p> <p>Life Quality: Careful design needed to meet objectives of WCS CP 57. See also comments earlier in</p> <p>Do not allocate due to likely impact on bats and SAC.</p>

4.47 Land off Church Lane

Site	Comment
Land off Church Lane	<p>Location / Landscape / Scale Location is outside settlement boundary but in close proximity to existing development. It is in Flood Zone 1. It would be likely to integrate well with the existing area of the village. Scale is moderate at 1.184 hectares and location would not compromise rural setting / landscape gap between North Bradley and Trowbridge. However, a low density of development would allow the creation of a scheme with rural rather than urban character.</p> <p>Community Support Unknown at this stage, but considered likely; there was strong opposition from neighbouring properties to the past planning application 03/00518/OUT nearby.</p> <p>Transport and Access Road Substandard access not suitable for development. Possibly unsafe.</p> <p>Neighbouring Properties Careful design and landscaping would be required to ensure adequate separation and screening between new homes and existing</p> <p>Listed Buildings There are listed buildings to the North (the Church and Church Gate) and North-West. Design would have to respect these and not harm their settings. They are sufficiently distanced from much of the site to consider this to be possible.</p> <p>Do not allocate.</p>

5.0 SEA of Draft Plan

- 5.0 The SEA was completed by consultants AECOM in November 2018. This is available as a separate document accompanying the NDP, where the pros and cons of all sites are considered. The SEA concluded that a strategy of medium-level growth, as proposed in the sites selected, had some positive environmental impacts and no significant negative ones. Regarding the NDP overall, the SEA concludes (9.45 and 9.46):

'The potential for significant positive effects are identified for the SEA themes of population and housing, community wellbeing and health, and transport. This largely relates to the delivery of new development, including: new housing which supports localised needs – particularly in terms of housing type; policy provisions which provide protection for local green spaces and recreation; support for new community facilities such as a burial ground to meet local needs; and the provision of improvements to sustainable transport networks – including the enhancement of active travel opportunities.

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'.

- 5.1 The SEA therefore gave the NDP a 'clean bill of health' and the SEA Environmental Report and its Scoping Report consultation responses made only two 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.
- 5.2 Site allocation and other policies were modified to reflect the SEA advice in point 1 above. Point 2 was taken forward by the addition of flood risk maps for both river and surface water flooding to all relevant documents.
- 5.3 The County ecologist produced an HRA in December 2018, which concluded that, subject to changes to the text, site allocations proposed in the draft NDP would be acceptable. The recommendations of the HRA were duly implemented in the Regulation 14 draft.

6.0 Final Conclusion and Recommendations

6.0 The draft North Bradley Neighbourhood Plan, seeks to deliver sustainable development, accommodating necessary housing growth, but establishing as large and as lasting landscape buffer between North Bradley village and Trowbridge as can be actually achieved. This means accepting two HSAP sites (613 / H2.1 and 3565 H2.6) unamended, and 298 / H2.2 following amendments including size of development, layout and location and nature of wider landscape buffer. Following site assessment, community engagement, SEA / HRA assessment, and negotiations with Wiltshire Council, Planners and Ecologists, the SSR therefore suggests the following housing site allocations be made. The plan also provides a mechanism for review.

6.1 Proposed housing site allocations for the North Bradley Neighbourhood Plan are therefore:

Site	Indicative Number of Homes
Park Farm, SHELAA 322	35
54 Woodmarsh, SHELAA 1040	25
TOTAL	60*

*Affordable Homes delivered would be 30% on a site by site basis.

6.2 This is above the 20 indicated in the early community questionnaire as being acceptable, but not far above the 50 or so indicated as the preferred level by respondents to the later sites community engagement. However, it is considered to be realistic number given the actual sites available, and the need to demonstrate to an examiner that, while imposing a landscape buffer around the village, the community have a balanced approach accommodating sufficient housing to meet local need and provide flexible delivery over the plan period. This level of development will also produce a significant benefit in terms of developer contributions that can be used to improve quality of life for residents and the overall sustainability of North Bradley.

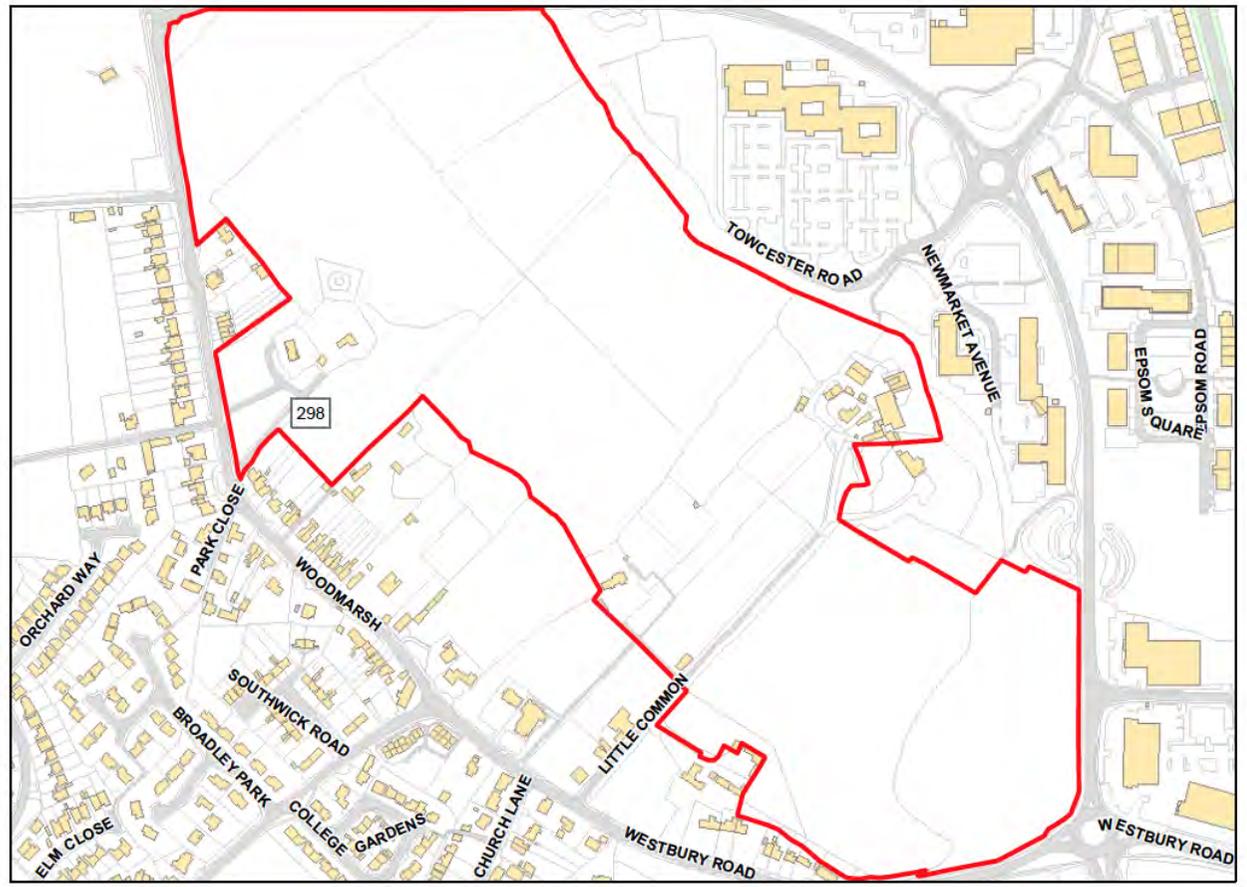
6.3 The above North Bradley Neighbourhood Plan sites can be taken forward in the Neighbourhood Plan document itself. Detailed policies should reflect the concerns and issues expressed in the SSR, in the SEA and HRA and by comments from community and consultees including Wiltshire Council which may require allocation to be qualified or conditional.

Appendix 1: Data Sources (not exhaustive)

Flood Risk Maps – Environment Agency website
Historic England: National Heritage List for England.
Landscape and Visual Setting Analysis Report Indigo Landscape Architects 2017
Manual For Streets, DoT and DCLG 2007
National Planning Policy Framework (NPPF)
Planning Practice Guidance (PPG)
Site Assessment for Neighbourhood Plans, A Toolkit..., Locality
UK Census - Wiltshire and North Bradley Parish – 2011 (Neighbourhood.statistics.gov.uk)
West Wiltshire Landscape Character Assessment 2007
West Wiltshire Local Plan 2004
Wiltshire Core Strategy 2015
Wiltshire Council Housing Land Supply Statement 2016
Wiltshire Council (2015): JSA for Trowbridge Community Area, [online]
Wiltshire Housing Site Allocations Plan (HSAP) Consultation Draft 2017
Wiltshire Council Site Allocations Plan Topic papers (all – including topic paper 5 – Viability)
Wiltshire Infrastructure Delivery Plan 2011-2016
Wiltshire Landscape Character Assessment 2005
Wiltshire Local Plan Viability Study 2014
Wiltshire Open Space Study 2015
Wiltshire Strategic Housing and Employment Land Availability Assessment (SHELAA) (2017)

Site	SHELAA 298. HSAP Site H2.2
Site address	'Land off A 363 off White Horse Business Park'

Site Map:



Ownership /Availability	Available
Site Area (hectares)	25.28 ha
Proposed development	Residential
Expected number of housing units	688
Timescales for development	Short-term

Main Photograph

1 Looking north-west from the end of Little Common



Local Site Constraints (Site 298)

Issue	Details	Can be mitigated by...?
Highways	<p>There are 5 possible access points to consider.</p> <p>a) Off A363 Near to Spitfire Retail Park (Photo 2)</p> <p>b) Off Woodmarsh (near Trowbridge Football Club)- (Photo 3)</p> <p>c) Off Woodmarsh (Opposite the Park Farm access) (Photo 4)</p> <p>d) Off Little Common –</p> <p>e) Off Towcester Road, behind the ex-Virgin offices. (Photo 5)</p> <p>Of these e) Towcester Road seems to be the most sensible, however this is a matter for the Highways Authority and the LPA. However it is clear that a useable access exists.</p> <p>We are not aware of any road accident problem locations within the vicinity of site 298.</p> <p>The site is served by bus route 265 running between Bath and Warminster/Salisbury. It is also Served by routes 67 (between North Bradley village centre and Trowbridge) and 87 (Trowbridge to Devizes)</p>	<p>Design complying with requirements of Highway Authority</p>
Landscape	<p>The site is extensive, covering a number of agricultural fields that abut the village of North Bradley, A363 and south-western boundary of the White Horse Business Park.</p> <p>The site is in direct conflict with the proposed landscape setting area described in the landscape setting report accompanying the NDP. Developing it would seriously compromise the meaningful separation of Trowbridge and North Bradley, leading to a loss of local character and distinctiveness.</p> <p>There is the old Baptist burial ground just off Little Common and the open fields around are essential to give an appropriate serene setting for interments and any villager visiting their relative's grave.</p>	<p>None possible</p> <p>Landscaping and design could mitigate if no development close by.</p>
Issue	Details	Can be mitigated by...?

<p>Biodiversity</p>	<p>The land currently provides BAP habitats (mature trees, hedgerows and grassland) and records indicate the presence of BAP/protected species (Great Crested Newts, Grass snake and Slow worm). It is also likely that foxes, deer and badgers use these fields. Herons and Kingfishers have also been seen locally.</p> <p>Recent HRA screening assessments nearby (e.g. 17/03269/OUT) have identified that development in this location could adversely impact on the Bath and Bradford on Avon SAC, which provides a home to a number of rare and protected species of bat, including Bechstein's bat. Wiltshire Council Planning Guidance (Ref) indicated (see map Appendix 3) that much of the site is within the area where impacts could be expected.</p> <p>The majority of the hedgerows in this area will be subject to "The Hedgerows Regulations 1997". Under this provision, for the purposes of section 97 (hedgerows) of the Environment Act 1995 and these Regulations, a hedgerow is "important" if it, or the hedgerow of which it is a stretch has existed for 30 years or more. A study of Google Earth 1945 air photo shows that the field system with its hedgerows was the same as today, so it is much more than 30 years old</p> <p>For additional information refer to the Ecology report prepared for the parish council.</p>	<p>Ecological study and mitigation proposals to the satisfaction of the LPA</p> <p>Ecological study and mitigation proposals to the satisfaction of the LPA. It may not be possible to mitigate successfully, given the size of this scheme.</p> <p>Retention of hedgerows, repair and planting of new hedgerows as soft boundaries rather than walls or fences.</p>
<p>Heritage</p>	<p>The site does not lie within a designated Conservation Area. There are no records of heritage assets at risk within the site.</p> <p>There are 4 listed structures within site 298.</p> <p>KINGS FARMHOUSE Grade II. Circa 1600 WILLOW GROVE. Grade II. GATEWAY TO BURIAL GROUND OF FORMER BAPTIST CHAPEL. Grade II. TWO MONUMENTS IN BURIAL GROUND OF FORMER BAPTIST CHAPEL. Grade II.</p> <p>Development of the site for housing may affect these historic assets, their setting and significance. The presence of these features may reduce the extent and/or density of any subsequent development.</p>	<p>Sensitive design required regarding impacts on setting.</p>

Issue	Details	Can be mitigated by...?
Flooding	Although located in Flood Zone 1, It is known locally that the north-western part of the site is prone to surface water ponding after heavy rain.	Consideration should be given to the inclusion of Sustainable Drainage Systems within any subsequent planning application process to control the risk of surface water flooding from impermeable surfaces.
Impact on neighbours	Generally, properties on Woodmarsh would be not too seriously affected providing adequate screening was employed. However, some properties off Westbury Road which have very small gardens could be seriously affected unless development is well set-back.	Sensitive design needed to prevent harm to neighbours.
How far from facilities?	The centre of site 298 would be about ¼ mile walk to the Spitfire Retail Park which has some food shopping and two takeaway restaurants. There is no doctor, dentist or post office in the near vicinity. Villagers have to go into Trowbridge. There is a pub, The Rising Sun, nearby and a Primary School in North Bradley village, about ½ mile distant. Overall it is clear that North Bradley village does not have the facilities to support significant extra development.	Lack of facilities means higher traffic levels likely going into Trowbridge, the route to which is already very congested at peak times. Lots of short car journeys would produce higher levels of emissions and could reduce air quality. Improvements in sustainable transport could help mitigate.

Comments and Notes? (Site 298)

This site is outside the settlement boundaries of North Bradley village and WHBP.

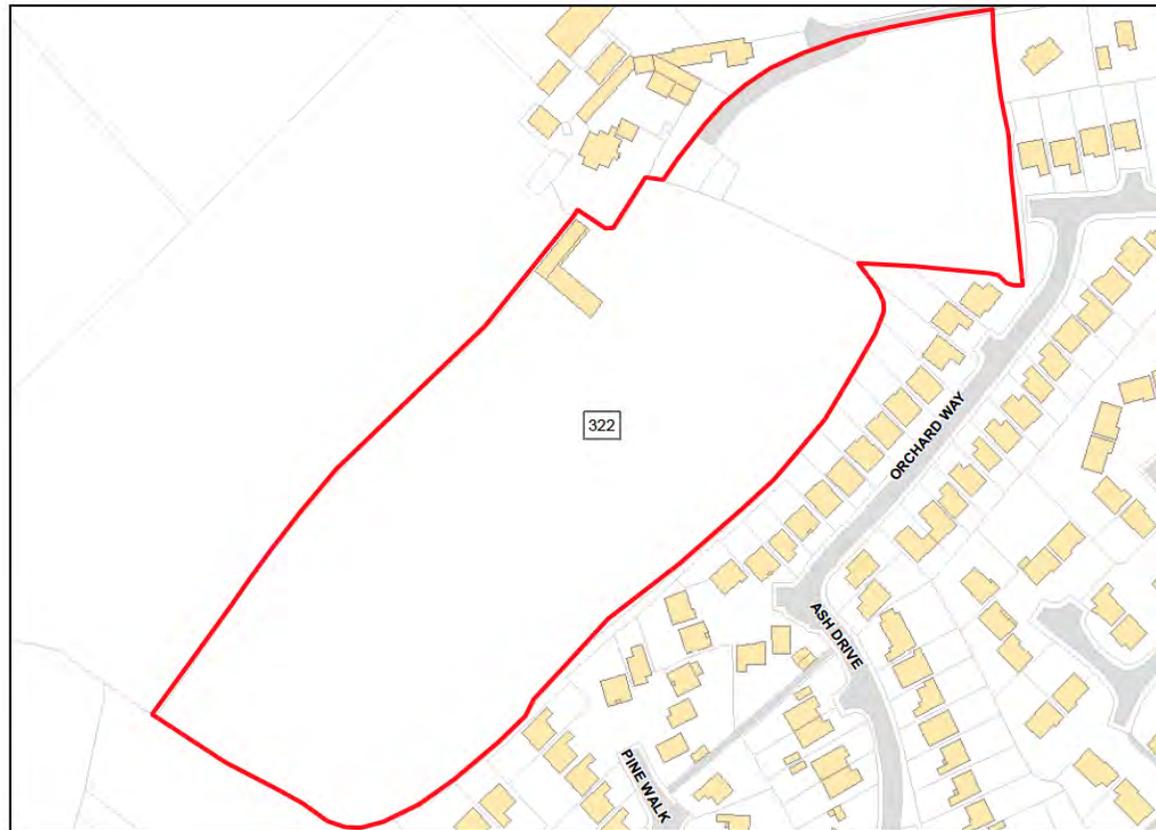
Scale of scheme in addition to Ashton Park Commitment - In the Ashton Park development it is clear that North Bradley Parish has already committed a large area of land to new development. The increase in population could be close to 2000, which will far exceed the current parish population of around 1800. This change will be very difficult for the parish to absorb and further large scale development is unlikely to be supported by the community during the NDP plan period.

Additional Photographs (Site 298)



Site	SHELAA 322
Site address	Park Farm

Site Map



Ownership /Availability	Available
Site Area (hectares)	3.14
Proposed development	Residential
Expected number of housing units	119
Timescales for development	Short-Term

Main Photograph of Site 322



Looking north-eastward from the Oak Drive recreational area

Local Site Constraints (Site 322)

Issue	Details	Can be mitigated by...?
Highways	<p>There may be access problems:</p> <p>a) via Woodmarsh Existing access to Park Farm and a few other properties is by a narrow track about 4m wide. This width is constrained on both sides, so a large development could not be accommodated here.</p> <p>b) via Oak Drive The grassed recreation area has been designated as a village green, the trees in it are quite mature and the hedge-line between the recreation area and Park Farm land has very mature trees in it. This area is very well used as a play and recreation facility and is an important feature in North Bradley village.</p>	<p>The junction of the access with Woodmarsh is not very satisfactory with poor visibility to the right when emerging because of a high wall to the bounding property. The Woodmarsh footway is well used by pedestrians. ?</p> <p>If demolished to make way for access, new facilities would have to be provided. Large scale development could still have access problems.</p>
Landscape	<p>The site is extensive, covering a number of agricultural fields that abut the northern edge of the village of North Bradley, mostly used for grazing. It is tucked in between Park Farm farmhouse and the rear gardens of Orchard Way.</p> <p>The site is outside the proposed landscape setting area for North Bradley.</p>	<p>Careful design needed to retain hedgerows.</p>
Biodiversity	<p>Some habitat will be lost. There may be harm to the SAC and bats, although less if the site was not developed to its full extent (i.e. fewer homes). Lees harm that Site 298)</p> <p>The majority of the hedgerows in this area will be subject to “The Hedgerows Regulations 1997”. Under this provision, for the purposes of section 97 (hedgerows) of the Environment Act 1995 and these Regulations, a hedgerow is “important” if it, or the hedgerow of which it is a stretch, has existed for 30 years or more. As mentioned above, a study of Google Earth 1945 air photo shows that the field system with its hedgerows was the same as today, so it is much more than 30 years old.</p>	<p>The land currently provides BAP habitats (hedgerows and grassland) and the presence of BAP/protected species (Great Crested Newts, Grass snake and Slow worm) should be considered. It is also likely that foxes, deer and badgers use these fields.</p> <p>Biodiversity would require an ecological study and mitigation strategy. SAC and bats also have implications for the density of the development. Hedgerow retention / planting /renovation required.</p>
Heritage	<p>The site does not lie within a designated Conservation Area. There are no records of heritage assets at risk within the site. As far as can be ascertained there are no heritage features on site although Broadleigh House at the Woodmarsh access is a handsome building. Archaeology would be possible however.</p>	<p>Any treatment of Park Farm access would have to consider the setting of Broadleigh House.</p> <p>Archaeological evaluation might be required depending on advice of LPA.</p>

Issue	Details	Can be mitigated by...?
Flooding	There is no evidence that flooding would be a problem. Site is in Flood Zone 1.	
Impact on neighbours	<p>About two dozen properties would have their views to the North-West affected, although the existing hedge-line must curtail much of the view into the fields. The noise and nuisance of construction could be considerable.</p> <p>Construction traffic using the existing access would be a nuisance to another few properties lying along the access lane.</p>	<p>Development would have to be set back and screened from existing properties.</p> <p>Construction impacts could be reduced by conditions limiting work to working hours, Monday-Friday.</p>
How far from facilities?	<p>The centre of site 322 would be about ½ mile walk to the Spitfire Retail Park which has some food shopping and two takeaway restaurants.</p> <p>There is no doctor, dentist or post office in the near vicinity. Villagers have to go into Trowbridge. There is a pub, The Rising Sun, nearby and a Primary School in North Bradley village, about ½ mile distant. Overall it is clear that North Bradley village does not have the facilities to support significant extra development.</p>	<p>Sustainability of large scale development here is questionable, given the lack of facilities. See survey form. A smaller scheme than capacity could be acceptable if for local need.</p> <p>Lack of facilities means higher traffic levels likely going into trowbridge, the route to which is already very congested at peak times. Lots of short car journeys would produce higher levels of emissions and could reduce air quality.</p> <p>Improvements in sustainable transport could help mitigate</p>
Other	<p>Scale of scheme in addition to Ashton Park Commitment - In the Ashton Park development it is clear that North Bradley Parish has already committed a large are of land to new development. The increase in population could be close to 2000, which will far exceed the current parish population of around 1800. This change will be very difficult for the parish to absorb and further large scale development is unlikely to be supported by the community during the NDP plan period.</p>	<p>Not possible other than to reduce scale of development to meet local needs only.</p>

Comments and Notes? (Site 322)

Small scale scheme here that can overcome the biodiversity and transport issues could be acceptable. However full development of the scheme should not be pursued for the reasons stated.

Additional Photographs (Site 322)



1. Access from Woodmarsh



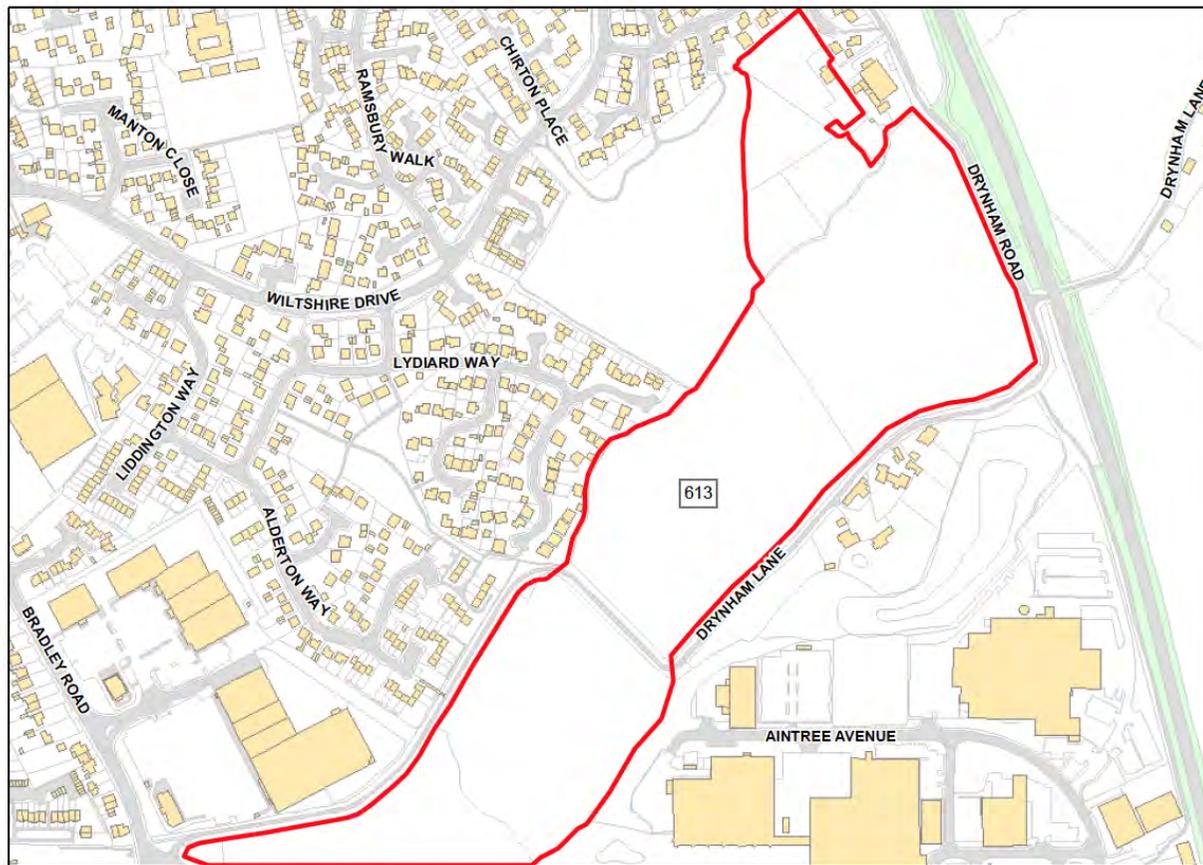
3. Hedge between recreational area and site 322



4. Same hedge - looking towards Oak Drive

Site	SHELAA 613, HSAP Site H2.1
Site address	'Elm Grove Farm'

Site Map:



Ownership /Availability	Available
Site Area (hectares)	11.98ha
Proposed development	Mixed Use
Expected number of housing units	366 ??
Timescales for development	Medium-Term

Main Photographs (Site 613)



1. Southern section looking towards WHBP



2. Northern section looking north towards the railway line

Local Site Constraints (Site 613)

Issue	Details	Can be mitigated by...?
Highways	<p>There are two possible access points. 1 Via Drynham Lane. 2 Off A363 near the Woodmarsh roundabout.</p> <p>The A363 is subject to considerable congestion already, so it would be essential that any access is designed to minimise congestion.</p> <p>Access needs to be retained for the properties off Drynham Lane on both sides of the railway. Drynham Lane itself has mature hedges on each side and from the ecological and environment viewpoint it would be desirable to retain these hedges and maintain the right of way as a Cycleway</p>	<p>Access would need to be satisfactory to the Highway Authority.</p> <p>To reduce congestion, it may be possible for the development to be split so that access from Drynham lane could be arranged for 50 or so properties.</p> <p>Retain hedgerows and cycle way where possible.</p>
Landscape	<p>The site is extensive, and immediately adjacent to developed areas in Trowbridge, covering a number of agricultural fields that abut the Wiltshire Drive development in Trowbridge and the north -western boundary of the White Horse Business Park. It comprises a series of agricultural fields bounded by mature hedgerows.</p> <p>Views to the north are contained by a railway embankment.</p> <p>The area is outside the proposed landscape setting for North Bradley. Well-designed development could be acceptable as the site is already partly surrounded by development. it would appear to merge with the existing built up area of Trowbridge. The landscape setting report produced for the NDP has suggestions respecting landscaping and layout.</p>	<p>Appropriate design needed. See landscape setting report as appendix to NDP</p>
Biodiversity	<p>The land currently provides BAP habitats (mature trees, hedgerows and grassland) The majority of the hedgerows in this area will be subject to “The Hedgerows Regulations 1997”. Under this provision, for the purposes of section 97 (hedgerows) of the Environment Act 1995 and these Regulations, a hedgerow is “important” if it, or the hedgerow of which it is a stretch, has existed for 30 years or more. A study of Google Earth 1945 air photo shows that the field system with its hedgerows was the same as today, so it is much more than 30 years old. The site is just on the periphery of the 15000m Bechstein bat buffer zone and effects on the SCA may be an issue. However, bats are likely to be already impacted by existing activity and lighting on several sides of the site,</p>	<p>Assessment and approved mitigation strategy needed.</p>

Issue	Details	Can be mitigated by...?
Heritage	Drynham Lane farmhouse is a Grade 2 listed building.	Reflect in design
Flooding	There is no indication that flooding would be a problem. Flood Zone 1.	Consideration should be given to the inclusion of Sustainable Drainage Systems within any subsequent planning application process to control the risk of surface water flooding from impermeable surfaces.
Impact on neighbours	There is a small number of properties on Drynham Lane and in the Wiltshire Drive development which could be adversely affected.	This could be done by planting a buffer belt of trees between the hedge of Drynham Lane and any new development. As access to these properties and those beyond the railway bridge need to be maintained, this could leave them in a quiet cul-de-sac situation. Some reinforcement of the hedges would help.
How far from facilities?	The south-western end is adjacent to the Spitfire Retail Park which has two eateries and some food retail. The north-eastern end is 800m from a convenience shop/PO and pub. There are bus routes on Wiltshire Drive and the southern part of the site is served by bus route 265 running between Bath and Warminster/Salisbury. It is also Served by routes 67 (between North Bradley village centre and Trowbridge) and 87 (Trowbridge to Devizes). There is no doctor, dentist or post office in the near vicinity. There is a Primary School in Holbrook Lane about a half mile from the site.	The site is located within the existing built-up area of Trowbridge. Immediate access to facilities is reasonable, but could be improved – for example through a mixed-use scheme.

Comments and Notes

Site is needed to permit strategic growth at trowbridge and would not count towards meeting local housing need in North Bradley (WCS Core Policy 29).

complete development of this site would make the town of Trowbridge contiguous with the WHBP.

Should the site be developed, there is the opportunity of enhancing the environment for the Bechstein bats by enhancing the Oak tree provision. Also, a copse created at the Bradley Road roundabout would help to screen the Spitfire Retail Park from North Bradley village and enhance the feeling of separation from Trowbridge town.

The south-western end of the site would be a good location for accommodation for the elderly as there are a number of bus routes into Trowbridge close by.

However, this area near to the Spitfire Retail Park is currently subject to considerable congestion during late afternoons as Bradley Road does not have the capacity to carry existing traffic caused by vehicles leaving the schools and work in the south of Trowbridge. Traffic queues extend well up into the Business Park. The Ashton Park development is expected to increase traffic in the North Bradley area by around 50% and the development on the ex WWDC offices site will also exacerbate the situation. With little prospect of any road improvements forthcoming to ease the Bradley Road situation it would be poor planning to permit any further large development that puts traffic into the road network there.

It is recommended that the quantum of development on this site should be considered against likely ecological, environmental and traffic impacts, including air quality.

Additional Photographs (Site 613)



3. View from Drynham Lane to right at roundabout



4. Drynham Lane

Site	SHELAA 672
Site address	Paddock at Little Common Lane

Site Map:



Ownership /Availability	Yes
Site Area (hectares)	0.596ha
Proposed development	Residential
Expected number of housing units	5
Timescales for development	Medium-Term

Main Photograph (Site 672)



Local Site Constraints (Site 672)

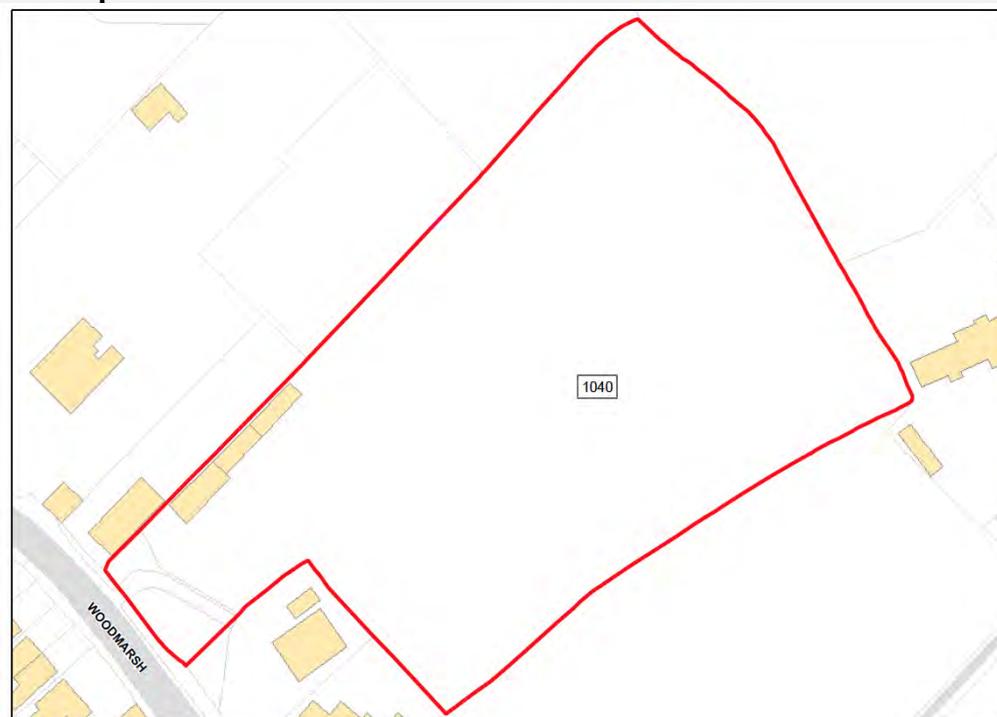
Issue	Details	Can be mitigated by...?
Highways	A363 Westbury Road is one of the heaviest traffic routes in the parish. There are many existing accesses on this section of road but a further one should be avoided.	Access from Little Common - The traffic generation of such a small area would be small, so the existing junction of Little Common with A363 Westbury Road should be able to cope.
Landscape	This is a small congested site. The land involved is back garden and paddock. Outside proposed landscape setting area.	In order to comply with WCS core policy 57 on design, and avoid creating a cramped and crammed' layout, the long thin nature of the plot would require a much lower density than normal. A successful scheme might include a short terrace or courtyard development.
Biodiversity	The land involved is back garden and paddock, probably attracting the usual village garden wildlife. There could be an impact on bats and the SAC however the site is small and well-integrated within the existing built-up area.	Ecological study and agreed mitigation.
Heritage	The site does not lie within a designated Conservation Area. There are no records of heritage assets at risk within the site There are 4 listed structures close to site 672. KING'S FARMHOUSE, WILLOW GROVE. GATEWAY TO BURIAL GROUND OF FORMER BAPTIST CHAPEL and TWO MONUMENTS IN BURIAL GROUND OF FORMER BAPTIST CHAPEL	Any development will require careful design to avoid negative impacts on the settings of the listed buildings.
Flooding	There is no evidence that flooding would be a problem - Flood Zone 1.	
Impact on neighbours	Few immediate neighbours – although there is a new residential building on the north-east end of the site which uses part of the site area. However, a well-designed scheme should be possible without excessively negative effects on neighbours.	Existing WCS policy will cover this issue.
How far from facilities?	The centre of site 672 would be about a one mile walk to the Spitfire Retail Park, which has some food shopping and two takeaway restaurants. There is a petrol filling station (PFS) with a shop at Yarnbrook and there is a planned PFS opposite the Platinum motor sales site. There is no doctor, dentist or post office in the near vicinity. Villagers have to go into Trowbridge. There is a pub, The Rising Sun, nearby and a Primary School in North Bradley village, about ½ mile distant.	The site is not in the most sustainable of locations.

Comments and Notes?

Possible. However, the cramped nature of the site means that the capacity of the site will be limited.

Site	SHELAA 1040
Site address	54 Woodmarsh

Site Map:



Ownership /Availability	Not Available. SHELAA was uncertain on this point but owner was contacted by Steering Group and has no intention of selling at the present time
Site Area (hectares)	1.12
Proposed development	Residential
Expected number of housing units	34
Timescales for development	Long-Term

Main Photograph (Site 1040)



From east looking towards house and stables

Local Site Constraints (Site 1040)

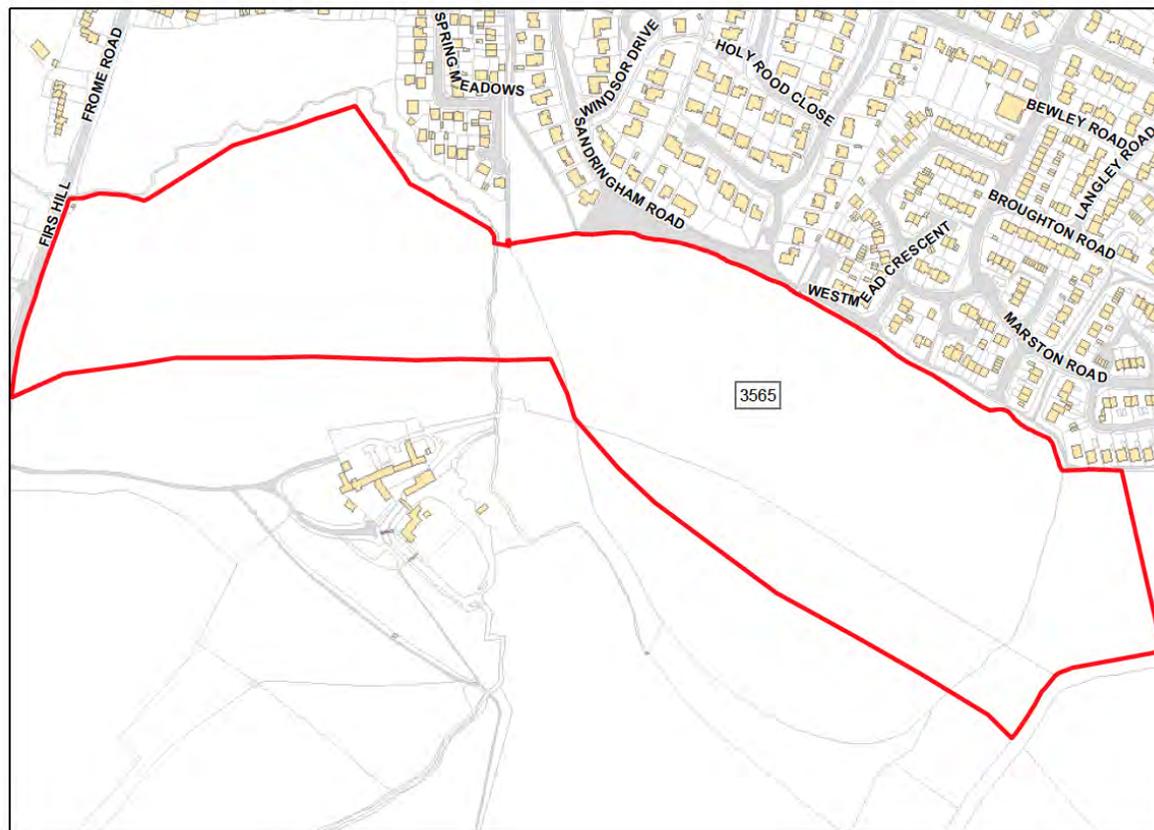
Issue	Details	Can be mitigated by...?
Highways	Access to this site could only be at the existing access point, Near to the Woodmarsh/Southwick road mini-roundabout. An earlier house on the site was demolished and replaced with a large bungalow in its place. Permission for this was granted in 2007 and extended in 2010. There are stables between the bungalow and Progressive Hall. Possible access could be gained by either demolishing the bungalow or retaining the bungalow and demolishing the stables.	Access possible. However, an acceptable access would have to be agreed with the Highway Authority.
Landscape	This site is essentially one paddock contained by mature hedgerows, together with an existing house.	
Biodiversity	As the hedgerows are mature and with ditches, they are almost certainly providing a habitat for many species of wildlife. Possible impacts on bats and SAC, however site is within existing developed area of the village.	Ecological study and acceptable mitigation strategy.
Heritage	The access point would be adjacent to the Progressive hall which, although not listed, is a significant building in North Bradley village.	Suitable landscaping could mitigate the effect.
Flooding	There does not appear to be a flooding problem associated with this site, although aerial photos indicate that there are land drains. Site is in Flood Zone 1.	Consideration should be given to the inclusion of Sustainable Drainage Systems within any subsequent planning application process to control the risk of surface water flooding from impermeable surfaces.
Impact on neighbours	The house on this site was extended in the last few years and has an open view across the paddock. This site is opposite some of the older properties in the village, in Woodmarsh. It also adjacent to Kings Lodge, which is also not listed but might justify protection for its historic role in the village.	Effects on neighbouring properties might be mitigated by suitable landscaping. Suitable screening would be required to protect new homes from noise from Progressive Hall as it is used for meetings and in Summer has to have open windows for ventilation.
How far from facilities?	The site is close to the Rising Sun pub and the Progressive Hall and two bus services pass the entrance., providing access to Trowbridge, Westbury and Warminster. There is no doctor, dentist or post office in the near vicinity. Villagers have to go into Trowbridge for shopping.	Lack of local facilities. Not the most sustainable location.

Comments and Notes (Site 1040)

None.

Site	SHELAA 3565, HSAP site H2.6
Site address	'Southwick Court'

Site Map:



Ownership /Availability	Available
Site Area (hectares)	18.18
Proposed development	Residential
Expected number of housing units	482
Timescales for development	Medium-Term

Main Photograph (Site 3565)



**Looking
across to
Boundary
Walk**

Local Site Constraints (Site 3565)

Issue	Details	Can be mitigated by...?
Highways	Access via A361 Frome Road is possible.	Good access design.
Landscape	A small part of the site (the north- east) is within the proposed landscape protection area required to maintain the separation of North Bradley village from Trowbridge. Further information is contained in the Landscape report prepared for North Bradley Parish Council.	The small part of the site within the proposed landscape protection area could be accepted subject to suitable landscaping in order to avoid conflict with a strategic scheme that Southwick (the nearby neighbourhood plan to the west, may accept). See below re neighbour impacts.
Biodiversity	<p>The land currently provides BAP habitats (mature trees, hedgerows and grassland) and records indicate the presence of BAP/protected species (Great Crested Newts, Grass snake and Slow worm). It is also likely that foxes, deer and badgers use these fields. Herons and Kingfishers have also been seen locally.</p> <p>Recent HRA screening assessments nearby (e.g. 17/03269/OUT) have identified that development in this location could adversely impact on the Bath and Bradford on Avon SAC, which provides a home to a number of rare and protected species of bat, including Bechstein’s bat. Wiltshire Council Planning Guidance (Ref) indicated (see map Appendix 3) that much of the site is within the area where impacts could be expected.</p> <p>The majority of the hedgerows in this area will be subject to “The Hedgerows Regulations 1997”. Under this provision, for the purposes of section 97 (hedgerows) of the Environment Act 1995 and these Regulations, a hedgerow is “important” if it, or the hedgerow of which it is a stretch has existed for 30 years or more. A study of Google Earth 1945 air photo shows that the field system with its hedgerows was the same as today, so it is much more than 30 years old</p> <p>For additional information refer to the Ecology report prepared for the parish council.</p>	<p>Ecological study and acceptable mitigation would be needed – if this is possible.</p> <p>The woodland around Southwick Court farmhouse should be bulked up with semi-mature Oak trees to assist the activities of Bechstein bats in the long term.</p>
Heritage	The site is just to the north of Southwick Court farmhouse. This is a 16 th and 17 th century 2* listed building. The Gatehouse and Bridge over the moat is 2* listed as well. It is essential that this building retains a setting appropriate for its status.	Sensitive heritage assets are present. Scheme would need careful design not to impact negatively on the setting.

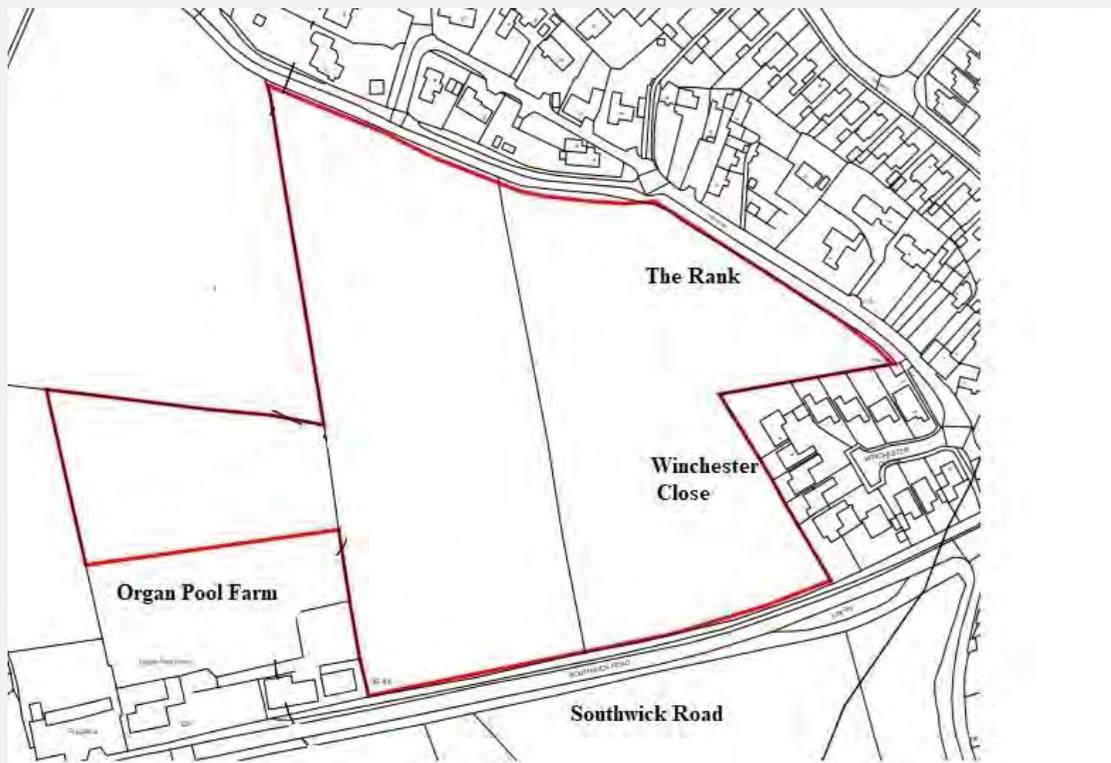
Issue	Details	Can be mitigated by...?
Flooding	The Flood Map for Planning shows a significant flood plain for the Lambrok on the western end of the site. Small part of site is in Flood Zone 3.	Location of uses on site and suitable flood management.
Impact on neighbours	The land owner to the east of the site is extremely concerned about potential intrusion into his paddock. Residents of Boundary Walk are likely to be extremely upset about their loss of view and the extra pedestrian and cycle movements along the Boundary Walk footpath. Construction work could impact on them as well with noise and dust.	To deal with the problem of intrusion, the extreme eastern end of the site should be planted up as an Oak copse. This could then be gifted to North Bradley Parish Council to maintain as extra habitat for Bechstein bats.
How far from facilities?	The western end of the site is about 800m from a small Tesco store, Trowbridge Garden Centre and the Black Horse pub. It is about the same distance to St John's Church and Church Hall and the Trowbridge site of Wiltshire College. The eastern end is about 6000m from the Spitfire Retail Park which has some food shopping and two takeaway restaurants. The Rising Sun pub is in North Bradley village about 1 km from the eastern end of the site. There is no doctor, dentist or post office in the near vicinity. Primary and Secondary schools are in Trowbridge to the north. Bus routes run along A361, Frome Road and A363, Bradley Road.	Immediate facilities are limited; however, the scheme is reasonably well-related to the existing built-up area of Trowbridge.
Other	The fields are criss-crossed with footpaths and these are very well used by dog walkers and other leisure users	Footpath network should be upgraded to higher standard of surfacing and to cycle way if possible to provide viable alternatives to the car and to enhance this network as a facility for healthy exercise and recreation.

Comments and Notes

None additional.

Site	Organ Pool Farm
Site address	Southwick Road, North Bradley

Site Map:



Ownership /Availability	Available
Site Area (hectares)	4.0 approx.
Proposed development	Houses, shop, public open space
Expected number of housing units	95
Timescales for development	Medium term

Main Photograph (Organ Pool Farm)



1. Looking from The Rank to Southwick Road

Local Site Constraints (Organ Pool Farm)

Issue	Details	Can be mitigated by...?
Highways	<p>Aces is possible. There are two options for access.</p> <p>1. via The Rank. The Rank is narrow and cars already have to park with one wheel on the verge to allow other vehicles to pass. It would not be easy to widen The Rank and this option has not been suggested by the potential developer.</p> <p>2. Off Southwick Road – The position shown in an indicative drawing by the potential developer is about the position of the 30mph speed limit signs, just to the west of the Southwick Road junction with The Rank and Church Lane. No right-turning lane is shown in the illustrative plan, neither is there any proposals shown for a pedestrian crossing. This latter would be needed to help pedestrians reach the church and school.</p>	Satisfactory scheme would need to be agreed with highway Authority – if possible.
Landscape	<p>The land is well contained and comprises mature/semi-mature hedgerows and trees. The site, to the west of North Bradley village adjacent to Southwick Road, covers a number of agricultural fields surrounded by mature hedgerows.</p> <p>The site does not conflict with the proposed landscape setting protection area.</p>	Hedgerow trees are few and it would be desirable to add more, particularly Oaks, to assist Bechstein bats.
Biodiversity	The site is close to the suggested consultation area for Bats in Wiltshire Planning Guidance. Impacts on bats and the SAC are possible.	An ecological study and mitigation would have to be agreed –if possible.
Heritage	There is no listed building in the vicinity but The Rank has a particular character, containing some of the oldest properties in North Bradley village.	This could be mitigated to some extent by a significant landscape buffer along the side of The Rank
Flooding	There is no specific flooding issue to highlight. Site is in Flood Zone 1.	Consideration should be given to the inclusion of Sustainable Drainage Systems within any subsequent planning application process to control the risk of surface water flooding from impermeable surfaces.
Impact on neighbours	Development on this site would have a serious impact on the residents of The Rank.	Some mitigation for the residents might be achieved by a significant landscape buffer along the side of The Rank. Consideration might also be given to an access to The Rank through the development, closing The Rank to motor vehicles just north of Winchester close.

How far from facilities?	The development proposal includes a convenience store. Currently there is no shop in North Bradley village. The Rising Sun pub is about 800m walk from the site. The 67 bus route runs close by the site and links with Trowbridge town centre. However, this bus service is not guaranteed as it relies on subsidy from Wiltshire Council. Medical and dental facilities are in Trowbridge. North Bradley primary school is about a 500m walk. Secondary schools are in Trowbridge.	
Other	The scale of the development is very large and far more than needed to meet local needs. Yet, it is not required for the strategic growth of Trowbridge, as, according to the HSAP are the strategic HSAP sites. This conflicts with WCS Core Policies 1, 2 and 29 and is inappropriate for a 'Large Village'	

Comments and Notes

This site is outside the settlement boundaries of North Bradley village, which have only just been adjusted. Any significant development in the area of North Bradley and Southwick villages is likely to meet environmental problems.

Should the applicant succeed with an application the access on Southwick Road should be a roundabout to act as a speed control on traffic coming from the derestricted section from Southwick village and provide pedestrian crossing provision by means of the traffic islands on the approaches.

Consideration might also be given to closing The Rank to motor vehicles, just to the north of Winchester close and diverting The Rank traffic through the development. The viability of a shop needs to be questioned. Over a number of years, the shops in North Bradley closed one by one. There is a convenience store in Southwick and one at Yarnbrook in the petrol filling station. In the next year or so there will be another on the outskirts of the WHBP. The likelihood is that a shop would close after a few years and the site would become housing.

The developer of this site contacted the Parish Council in February 2018 and also carried out a consultation in the village. The response of the PC to this is given as appendix 10. The PC also agreed to meet the developer.

Ashton Park Commitment - In the Ashton Park development it is clear that North Bradley Parish has already committed a large area of land to new development. The increase in population could be close to 2000, which will far exceed the current parish population of around 1800. This change will be very difficult for the parish to absorb and **a further development of 95 houses should therefore be avoided in the plan period.**

Additional Photos for Organ Pool Farm Site



3. The Rank



4. Southwick Road

Appendix 3: North Bradley and Proposed Landscape Gap. Original Diagram:

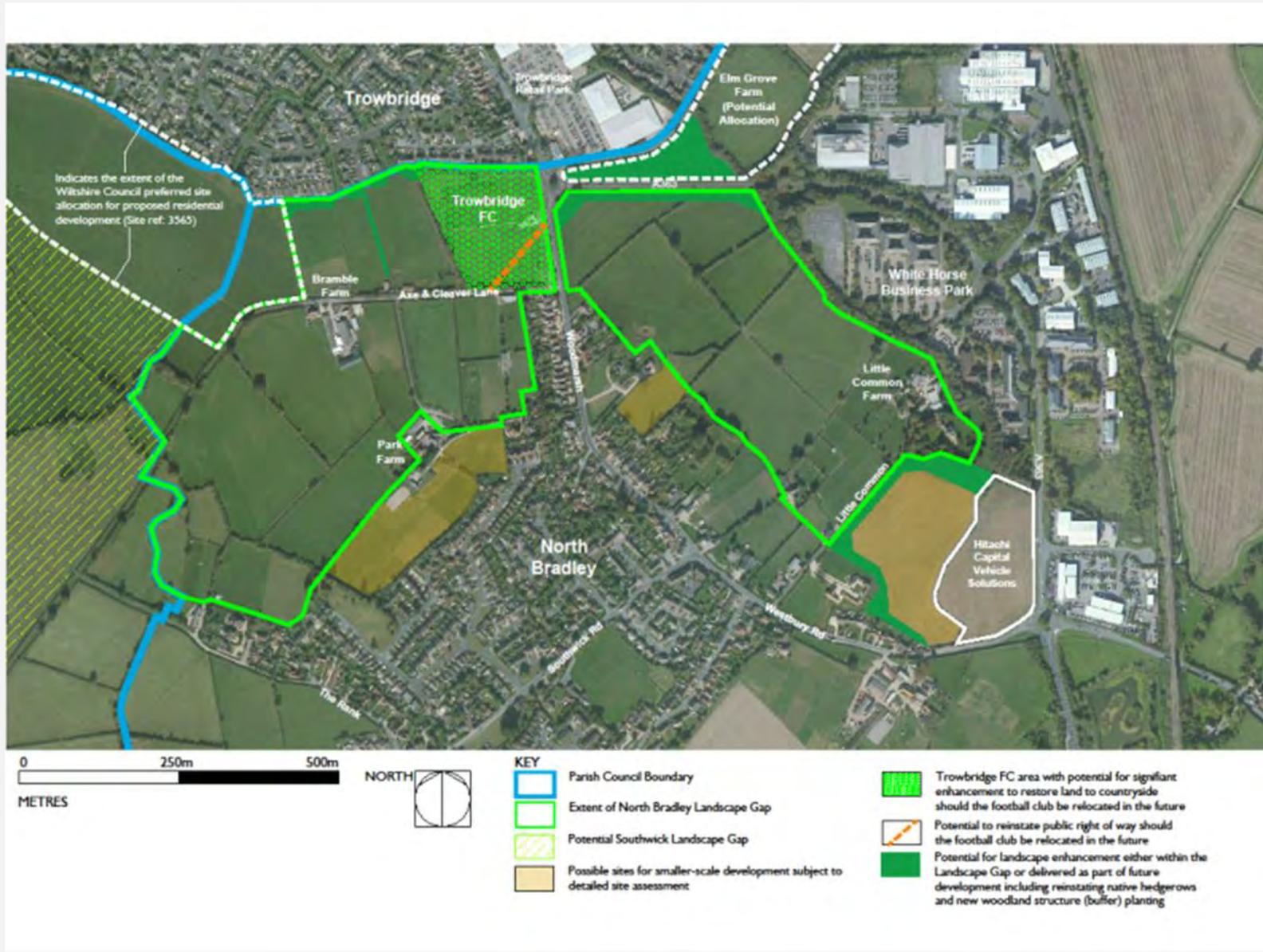
LANDSCAPE & VISUAL SETTING ANALYSIS
PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE



KEY	
	Parish Council Boundary
	Extent of North Bradley Landscape Gap
	Potential Southwick Landscape Gap (subject to analysis)
	Possible sites for smaller-scale development subject to detailed site assessment
	Trowbridge FC area with potential for significant enhancement to restore land to countryside should the football club be relocated in the future
	Potential to reinstate public right of way should the football club be relocated in the future
	Potential for landscape enhancement either within the Landscape Gap or delivered as part of future development including reinstating native hedgerows and new woodland structure (buffer) planting

FIG. 6 - LANDSCAPE GAP RECOMMENDATIONS

Appendix 3: Revised Diagram following Community Engagement

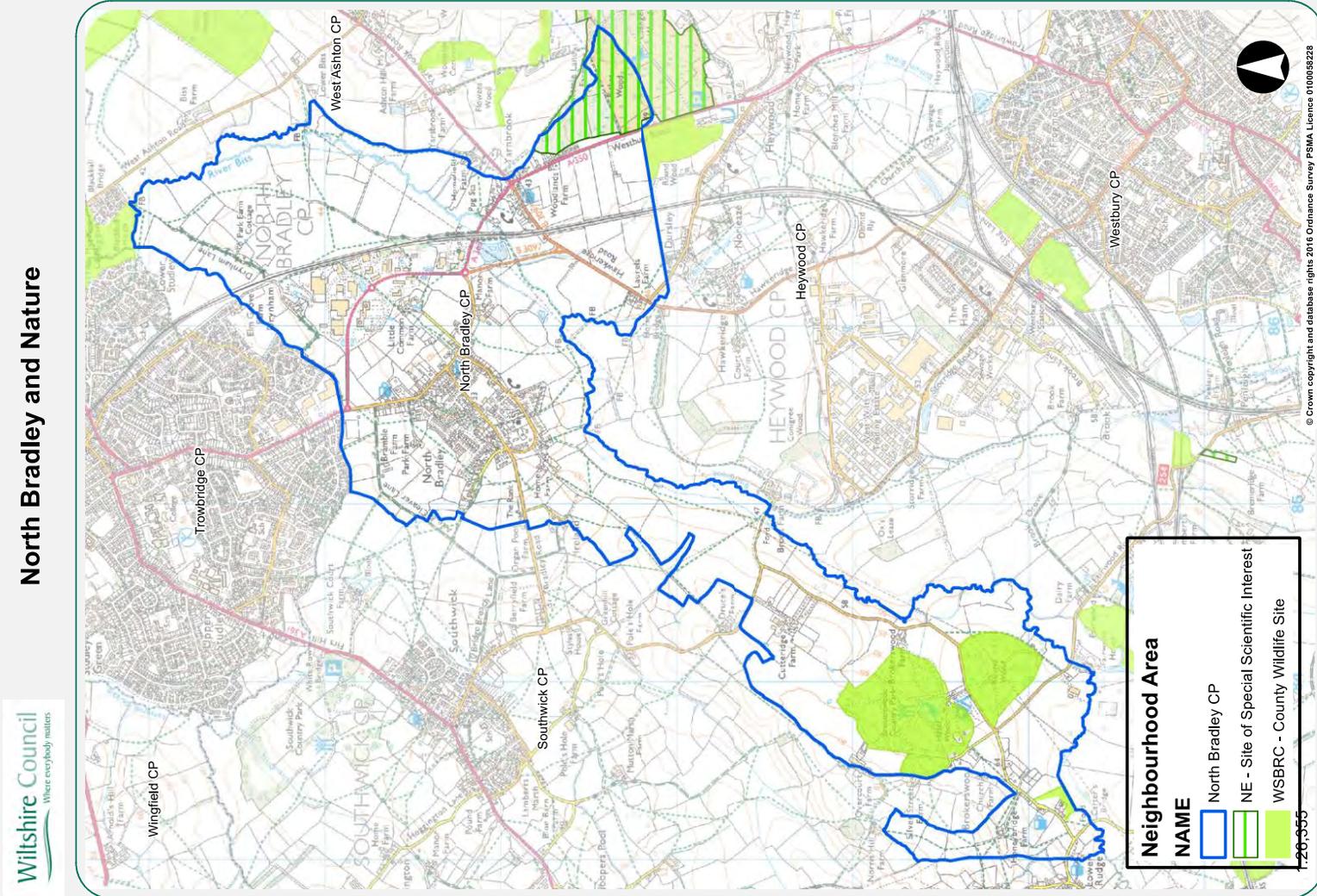


LANDSCAPE & VISUAL SETTING ANALYSIS
PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE

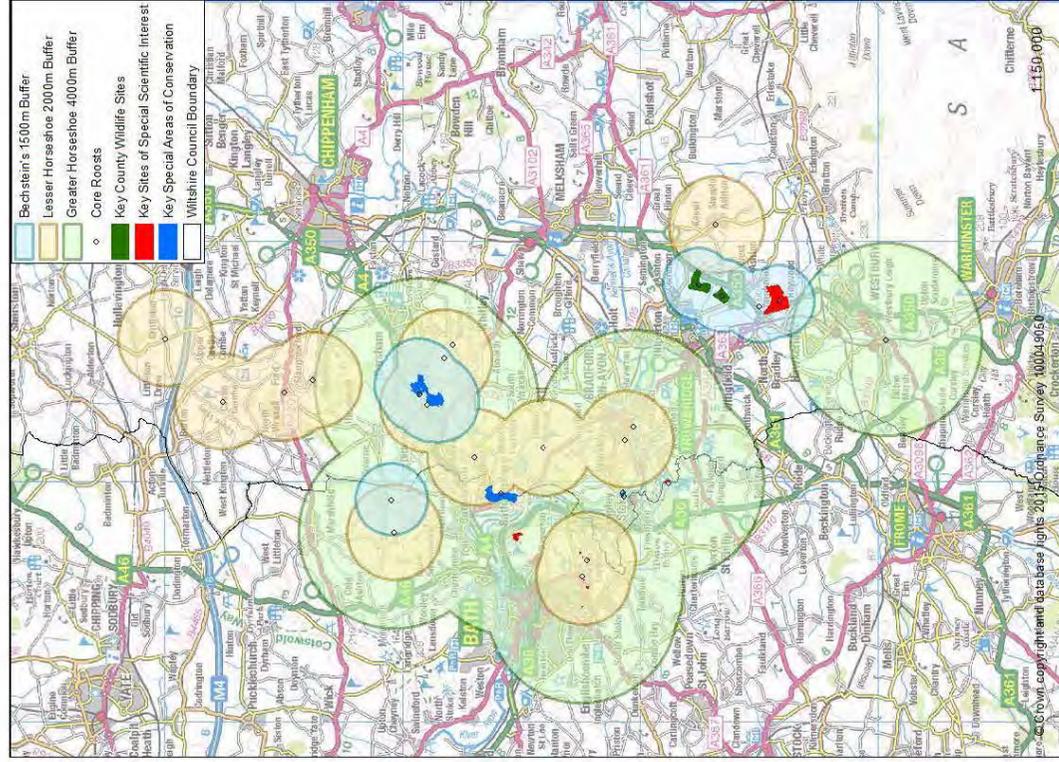


FIG. 7 - LANDSCAPE GAP RECOMMENDATIONS

Appendix 4: North Bradley and Nature



Plan 2 Inset map of the Bradford-on-Avon Bat SAC Core Roosts showing Core Areas (i.e. buffers) for each species



Appendix 4 continued: e-mail from County Ecologist re scale and density

----- Forwarded message -----

From: **Elphick, Fiona** <Fiona.Elphick@wiltshire.gov.uk>

Date: 22 January 2018 at 15:38

Subject: RE: Houses per hectare

To: "Cox, David" <David.Cox@wiltshire.gov.uk>, Parish Council <parishcouncil@northbradley.org.uk>

Cc: "Clampitt-dix, Georgina" <georgina.clampitt-dix@wiltshire.gov.uk>, "Kilmister, Michael" <Michael.Kilmister@wiltshire.gov.uk>

David,

At a very basic level, the density of individual sites may need to consider Bechstein's bats – this will need to be explored through sufficient ecological survey to inform the site level planning application. If a hedgerow or other boundary/linear feature within or adjacent to the site is found to be a key flight line for the species, a reduction in the density of housing within the site may be necessary to accommodate sufficient space for the creation of a dark corridor that will protect the established flight line(s) by buffering the effects of the development i.e. lighting, loss of foraging.

I'm not sure if that answers the question sufficiently but please get back to me if you need more.

Best wishes,
Fiona

Fiona Elphick MSc. Env. Biol.

Senior Ecologist,

Landscape & Design Team,

Economic Development & Planning,

Wiltshire Council,

Bythesea Road,

Trowbridge,

Wiltshire BA14 8JD.

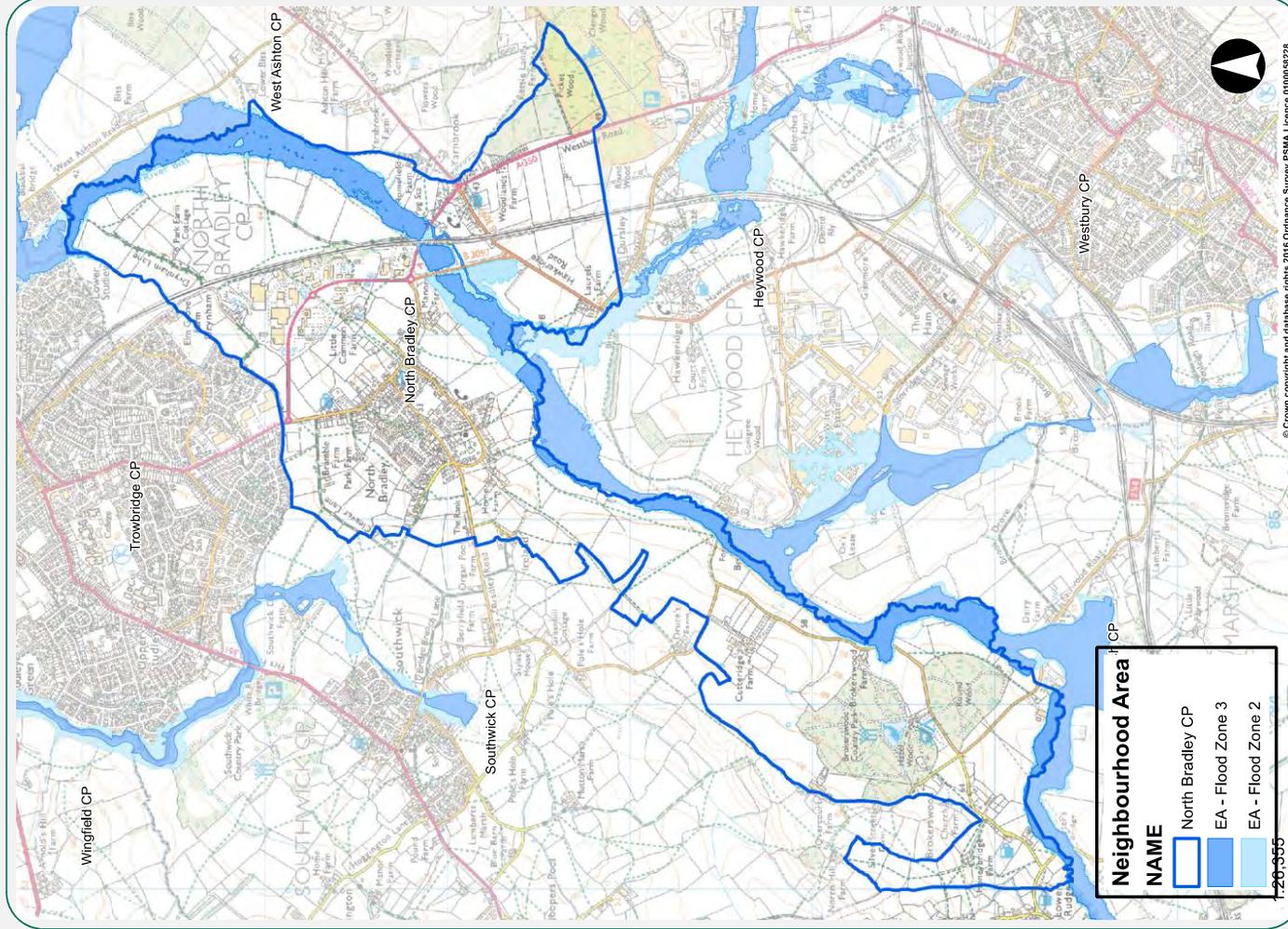
Tel: 01225 713241

Mobile: 07796 957181

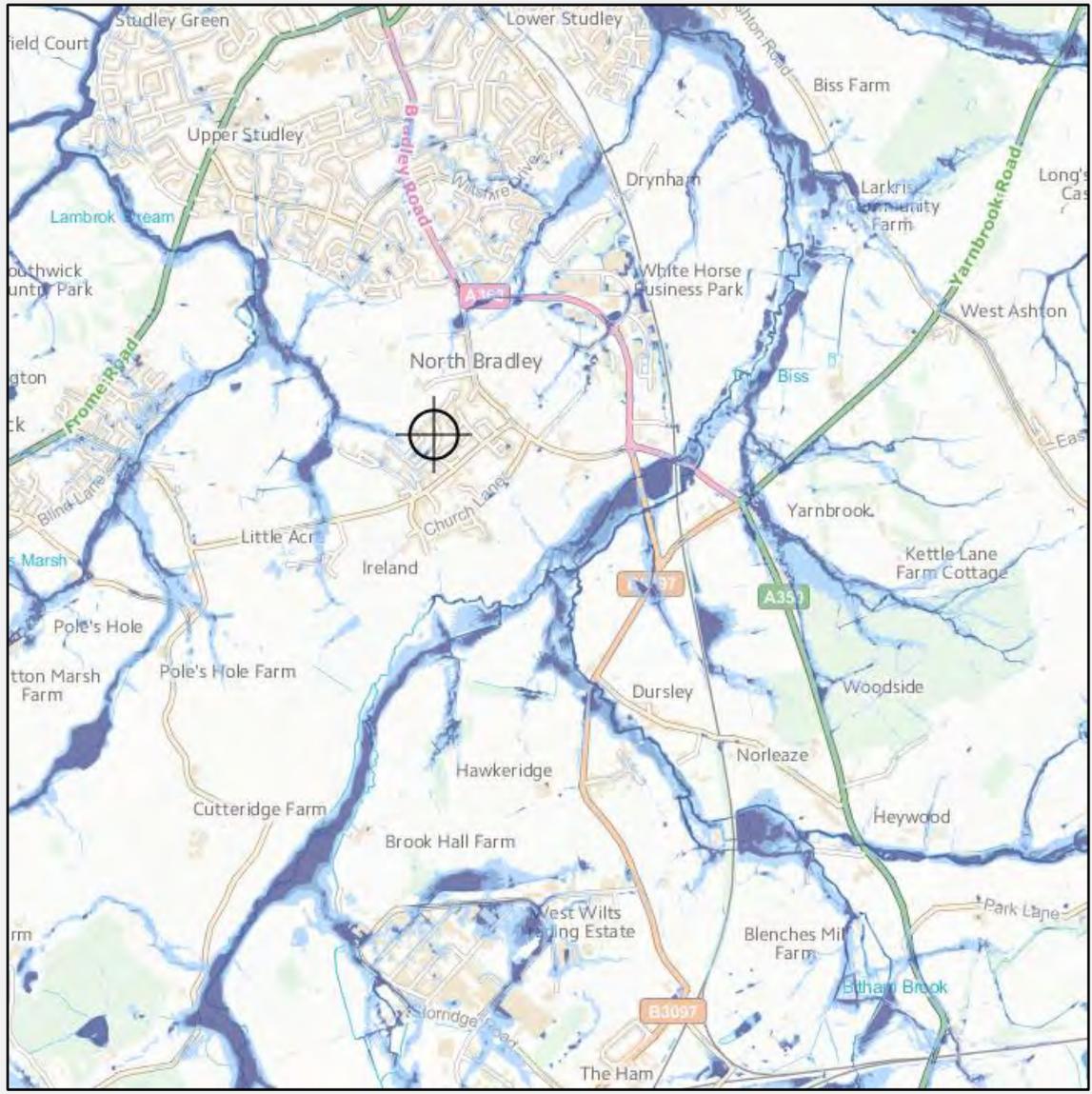
Email: fiona.elphick@wiltshire.gov.uk Web: www.wiltshire.gov.uk

Appendix 5: North Bradley and Flood Risk - Rivers

North Bradley and Flood Risk



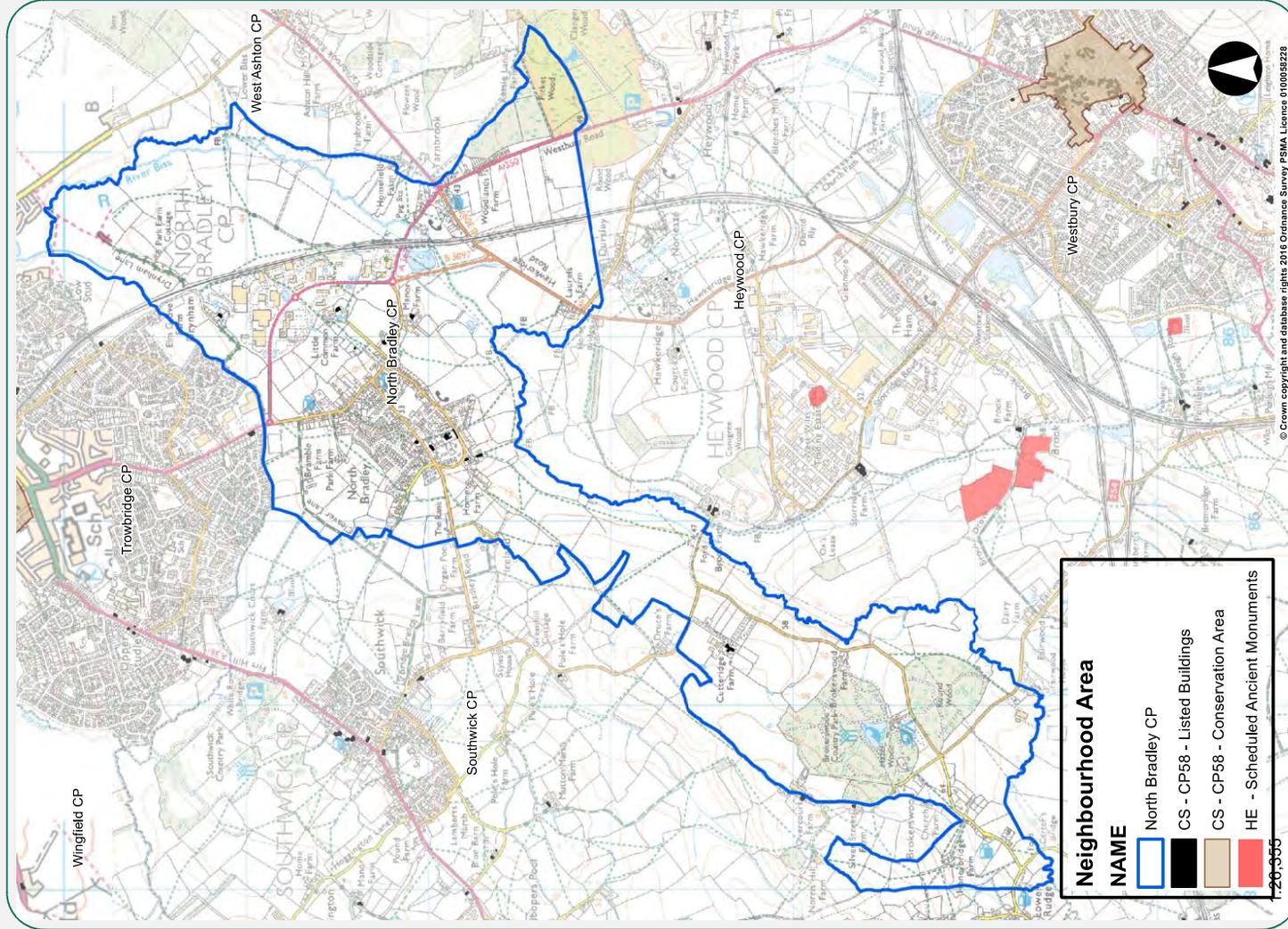
Appendix 5: North Bradley and Flood Risk – Surface Water



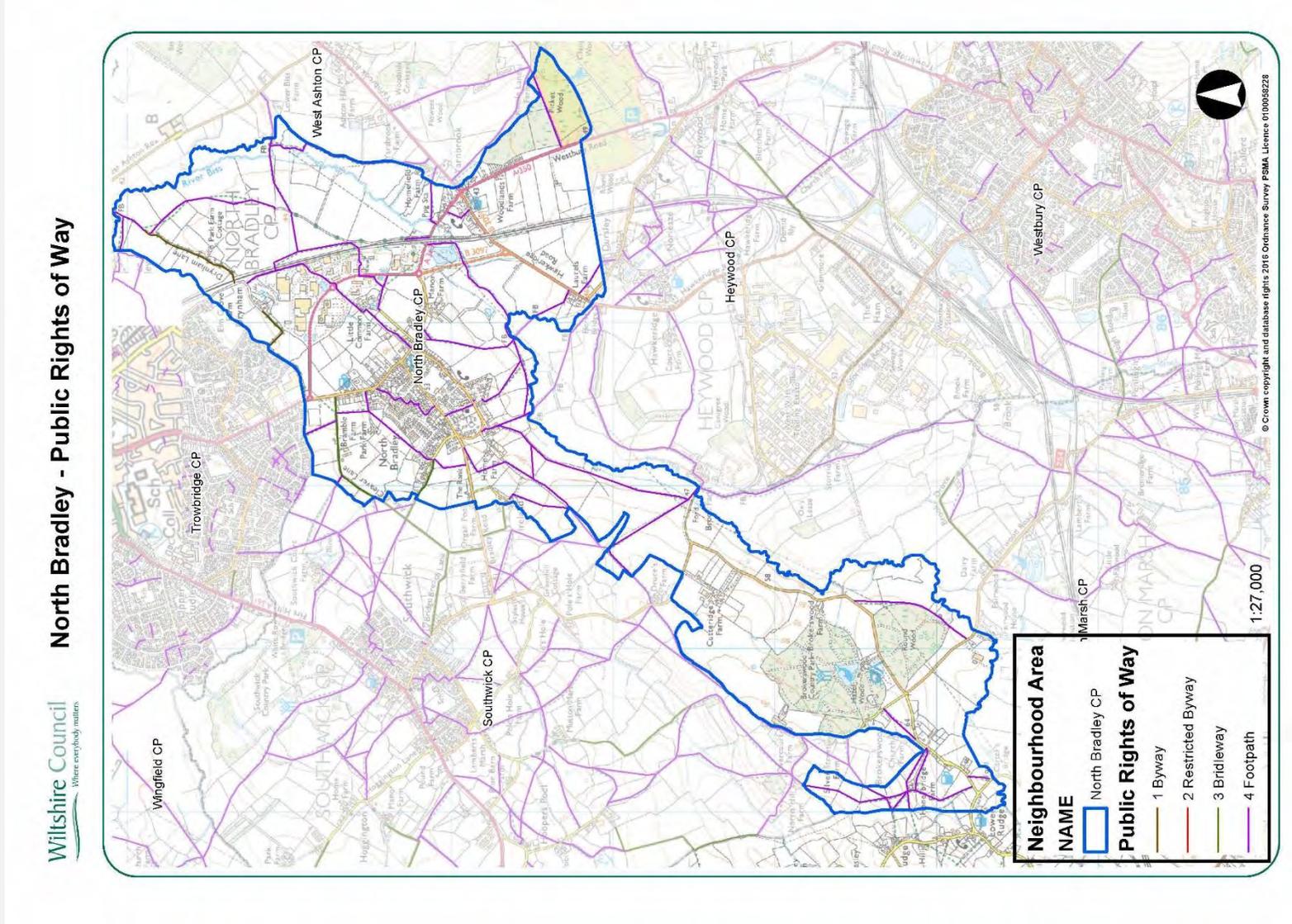
Appendix 6: North Bradley and Heritage



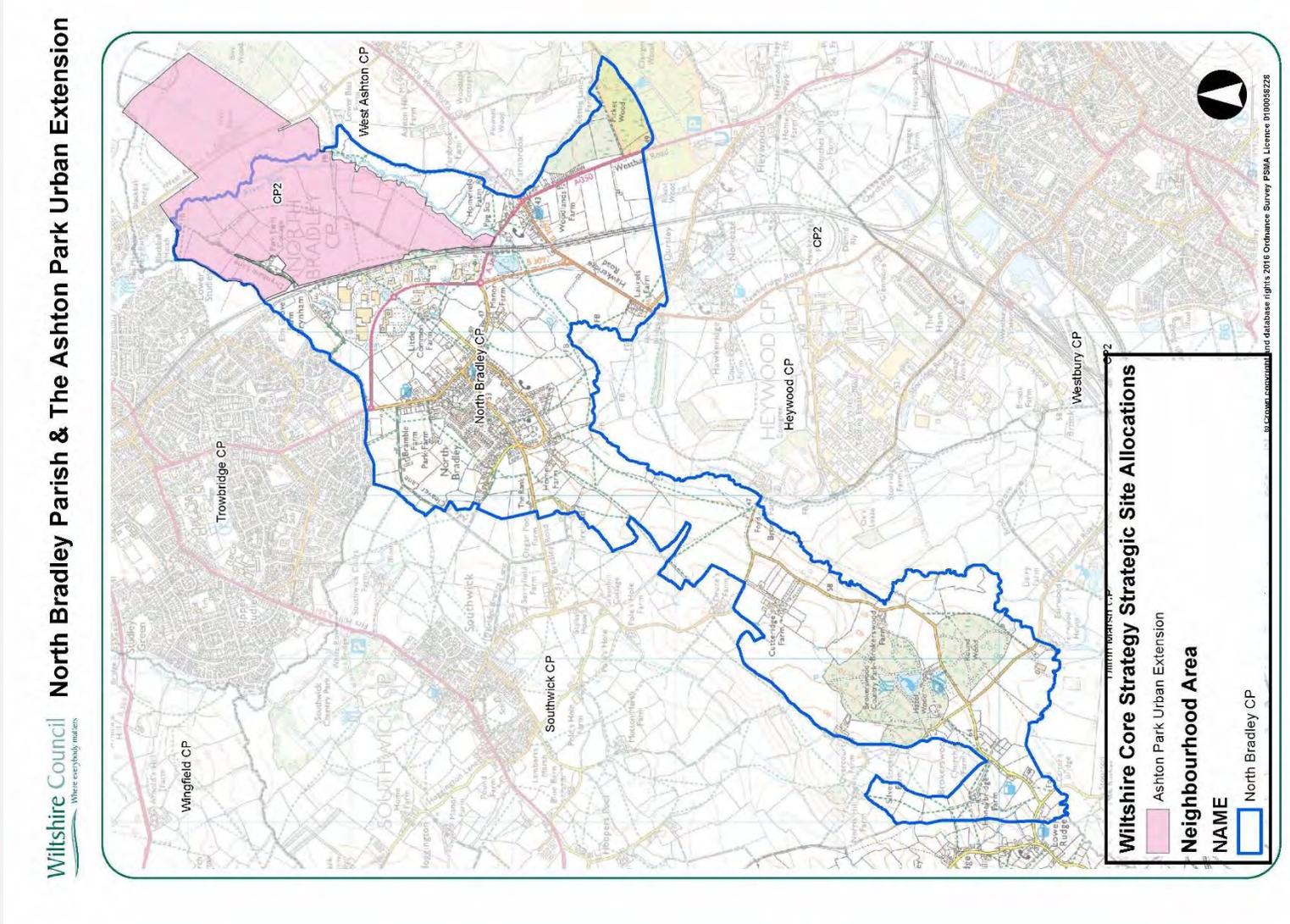
North Bradley and Heritage



Appendix 7: North Bradley's Public Rights of Way



Appendix 8: North Bradley and the Ashton Park Scheme





NORTH BRADLEY PARISH COUNCIL

INCORPORATING

NORTH BRADLEY, BROKERSWOOD AND YARNBROOK

50 Newtown
Westbury
Wiltshire
BA13 3EF

To residents of Birchenleaze, The Rank and Winchester Close

15 February 2018

Dear Resident

The Parish Council is aware of recent communications from Quatro on behalf of Welbeck Strategic Land II LLP regarding land at Organpool Farm and their recent proposals for development. These proposals have been discussed at Parish Council meetings in January and February. At the February meeting it was resolved to invite the developer to answer any questions that residents may have. The developer will be attending April's parish council meeting on 9 April at 7.30 pm.

As you may know, the Parish Council is leading the community in producing our neighbourhood plan. We are currently investigating whether any housing needs to be allocated and if so where. The site at Organpool Farm will be considered through that process, when we will be inviting the community to comment. Initial analysis suggests that we will be rejecting the Organpool site for the following reasons, although residents are of course free to make up their own minds.

The site is:

- Outside the settlement boundary and in open countryside contrary to Wiltshire Core Strategy (WCS) Policies 1 and 2
- Not of appropriate scale for a large village (e.g. far more than needed to meet local needs) as per WCS policies 1 and 2
- Not a Housing Site Allocation Plan site, so not part of planned strategic growth
- Possibility of unacceptable impact on bats (and not yet accompanied by an ecology study or mitigation proposals for the Special Area of Conservation)
- Viability of proposed shop is questionable.
- Land should remain in agricultural use
- Consideration of the site by Wiltshire Council now would be premature in view of the emerging North Bradley Neighbourhood Plan.

In our view the proper way to consider this site is through the neighbourhood plan, because that is where the views of the community will be given the right degree of weight

Please see map of site from the developer which is for illustrative purposes only.

Yours sincerely

Karin Elder

Karin Elder (Mrs) (Clerk to North Bradley Parish Council)

T: 01373 823907

e: parishcouncil@northbradley.org.uk
www.northbradley.org.uk

North Bradley Neighbourhood Plan

Our Community 2017-2026

Site Survey Form Westbury Road, Yarnbrook



Purpose

The purpose of this survey form is to collect local data to aid site selection in the Neighbourhood Plan. The starting point is to consider sites listed in the Strategic Housing Land Availability Assessment (SHLLA) and those strategic sites promoted in North Bradley by the Housing Site Allocations Plan (HSAP).

Each site needs to be carefully considered against the criteria set out on this form, with particular emphasis upon strengths and weaknesses as a potential site for development. Is this a site we could allocate or support?

Where problems exist with a site, the survey offers the opportunity for suggestions to be made of how these can be mitigated or overcome (e.g. through requirements to be set out in a policy or planning conditions). No site will be perfect, but what is sought are sites that are essentially 'suitable' in planning terms and which the community could support. Where problems exist, photographs illustrating these would be very useful (e.g. poor access, nearby neighbours, listed buildings, biodiversity issues, flooding etc.).

Once we have completed this survey, the result will be added to the draft Site Selection Report (SSR) and the SSR will then be put to the community as a whole to offer their views. They will also be able to suggest new sites at this point providing each one is accompanied by a certified map and proof in writing that the site is available. Only once we have community input will a final selection of sites be made. This will then go out to formal consultation with the entire plan at the Regulation 14 stage.

Site	Westbury Road, Yarnbrook
Site Address	A363 Westbury Road, Yarnbrook, North Bradley

Site Map



Ownership/Availability	Available
Site Area (Hectares)	Approx 1.6 hectares
Proposed Development	Houses,
Expected Number of Housing Units	20-30
Timescales for development	Medium term

Main Photograph (Westbury Road)



1 Looking west from the field access in Westbury Road

Local Site Constraints (Westbury Road)

Issue	Details	Can be mitigated by...?
Highways	<p>There are two options to examine for access.</p> <p>1 Off Westbury Road, A363. If right turns are considered a problem on this busy stretch of A road then they could be banned and the movements completed by U turns at the roundabouts not too far away.</p> <p>2 Via the new roundabout proposed for Yarnbrook in the A350 upgrade.</p>	
Landscape	The land is well contained and comprises mature/semi-mature hedgerows and trees. The site, on the northern side of Yarnbrook village comprises a field currently supporting horses.	Hedgerow and trees are few and it would be desirable to preserve those present and add more, particularly Oaks, to assist potential Bechstein's bats development.
Biodiversity	The land currently provides BAP habitats (mature trees, hedgerows and grassland). The presence of BAP/protected species (Great Crested Newts, Grass snake and Slow worm) is likely. It is also likely that foxes, deer and badgers use these fields.	Careful design an mitigation if required.
Heritage	There is no listed building in the vicinity but new housing should fit in with the loose character of development in Yarnbrook.	This could be mitigated to some extent by a significant landscape buffer
Flooding	The land is within flood zone 1. FZ's 2 and 3 are nearby	An FRA may be needed at the application stage to guide design.
Impact on neighbours	Development on this site would have a some impact on a few residents who live off Hawkridge Road	Some mitigation for the residents might be achieved by a significant landscape buffer along the west side
How far from facilities?	There is a shop and garage and pub close to the site. Bus stops with routes to Trowbridge and Westbury are located immediately adjacent to the site. Medical and dental facilities are in Trowbridge. North Bradley primary school is about a 1000m walk. Secondary schools are in Trowbridge.	Not an ideal location but possible.
Other	The footway into North Bradley village school is not continuous on one side of the A363.	Pedestrian crossing facilities along the route need to be considered and upgrade of footpath. .

Comments and Notes (Westbury Road)

The landowner has suggested that about 60 houses should be allocated on the site. However, this would require a very dense development that would be out of character with the rest of Yarnbrook village. It is well sited with regard to facilities but the flooding aspect is likely to mean that the whole site cannot accommodate buildings. Some land is likely to be needed for drainage control and a buffer to the railway. Something like 20 to 30 units may be appropriate.

The aspect of pedestrian and cyclist form the site into North Bradley village needs detailed consideration. The A363 footway on the south west side in front of Bradley Mill House. Pedestrians have to cross to the north east side and then back again to pass under the railway line. Some crossing assistance should be part of any development, perhaps central refuges.



2 Lane from Hawkrige Road



3 A363 showing lack of footway on left side



4 Properties likely to be affected



5 Field access on A363

Appendix 11: Community Research Team

In addition to assistance from PlanningStreet, a professional town planning consultancy, the scoping researchers from the community were:

Horace Prickett
Roger Evans
Mrs. Lee Lee
Mrs. Gina Lunt
Mr. Mike Kettlely
David Feather
Ken McColl
Mrs. Karin Elder

David King BA (Hons.), Dip. TP, MRTPI

