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Wiltshire,  
BA13 3HN

**SENT BY EMAIL**

**Date:** 19 October 2020

**Our ref:** 31449/01/AC/JMi/18877148v1

Dear Sir / Madam

**Representations to Southwick Neighbourhood Development Plan**

We write to provide comments to the consultation draft of the Southwick Neighbourhood Development Plan on behalf of our client Redrow Homes.

**Consistency Between Documents**

As also raised in our representations to the non-statutory consultation in August 2019, we have concerns regarding the robustness of the evidence base underpinning the Neighbourhood Plan. While it is noted that some of these documents have been updated, there remains significant inconsistency between the evidence base documents themselves and how these documents have then been interpreted when drafting the Neighbourhood Plan.

This is discussed further below but to provide an example, the SEA (June 2020) and the SOA (March 2020) assessed the Wesley Lane site as being 6ha and capable of delivering 30-60 units (albeit the SEA also refers to 180 units), the Site Selection Report considers the 'Phase 1' area only for 30 dwellings (without defining this area beyond stating it is 3ha) and then the Neighbourhood Plan allocates a different area of land again of 1.6ha for 27 units.

The purpose of the SEA is to consider the anticipated environmental effects of the plan, but with inconsistencies between the SEA and the draft Neighbourhood Plan itself, these effects have clearly not been accurately or adequately assessed.

**Chapter 4 – The Evidence**

Chapter 4 of the draft plan further discusses the evidence which has underpinned the plan.

As set out in our previous representations (August 2019 and January 2019), we still have significant concerns regarding the methodology of the 2018 Housing Needs Survey. To reiterate our key concerns:

- The Survey considered affordable housing need for the following three or five years only (the report does not specify which was correct) yet the Neighbourhood Plan allocates housing for the 2018-26 period;
- No extrapolation of housing need has been made for approximately the two thirds of Parish residents who did not respond and the survey made no allowance for a non-representative sample; and

- The respondents were disproportionately owner occupiers, aged 65 or older yet and therefore far less likely to need or want affordable housing.

It is noted that there is reference in the plan to the need for the 8no. affordable homes being a minimum figure which is welcomed. That said, the plan is clear that *'there are no available and deliverable sites within the settlement that can meet the identified demonstrable unmet need of affordable housing'*, and therefore, without allocating a further greenfield site, it is difficult to see how the plan will assist in providing for above this 8no. unit figure.

The Government has recently consulted on changes to the current planning system which suggests a likely change to increase the threshold at which affordable housing is required, to sites of 40-50 units. This change could come in as soon as autumn this year and would effectively mean that neither of the sites identified in the draft plan will be obliged to provide affordable housing.

As stated previously, we recommend that the housing need figure is increased to accurately reflect the needs of the full Parish population and additional or larger sites are allocated to ensure affordable housing is actually delivered within the village.

## **Chapter 9, Policy 1 – Landscape Gap**

Redrow Homes supports Policy 1 and agrees with the LVIA which has found that the landscape setting of Southwick should be preserved to the east of the village to maintain a separation distance to Trowbridge.

## **Chapter 10 – Community Allocations for New Homes**

Paragraphs 10.2 – 10.24 detail the process undertaken to identify sites for new housing within the village. However, it is unclear what the deliverability of the two proposed sites are and how quickly housing could be delivered.

The Neighbourhood Plan is seeking to meet housing needs identified in the Wiltshire Core Strategy and as such, any allocated housing site must be deliverable by April 2026 to meet this need.

In this regard, it is noted that the Heli-beds site (Policy 5a) has an extensive planning history and it appears from Wiltshire Council's planning portal that there have been at least two previous applications for residential development which have not been implemented. It is therefore questioned whether the development of this site is viable and whether it is deliverable within the next 5-6 years.

In terms of 'Land off Wesley Lane', this site has no planning history and the evidence base is limited and does not provide any indication of how quickly this site could be delivered or whether any detailed technical assessment has been undertaken. Indeed, the Site Selection Report makes no mention of timescales for delivery for the proposed sites which is a significant omission. It is noted that the Site Options and Assessment Report makes reference to it being deliverable within 5 years, but based on a comparison of the assessment for the Blind Lane site, this conclusion does not appear to be evidence based.

It is considered that evidence should be provided that these sites are available, viable and deliverable for housing development by April 2026 for the plan to be considered sound.

## **Policy 5b – Land off Wesley Lane**

The Wesley Lane site is circa 1.6ha, yet Policy 5b states that the site will deliver just 27 dwellings. This would represent a density of circa 16 dwellings per hectare. Generally, sites should be aiming to achieve a density of at least 30 dwellings per hectare. This therefore represents a significant inefficient use of land in conflict with NPPF paragraph 123 which states that *"it is especially important that planning policies and decisions avoid*

*homes being built at low densities, and ensure that developments make optimal use of the potential of each site”.*

Clearly this policy does not seek to make optimal use of land and will simply mean that the village will need to identify more greenfield sites for release in the near future. This is particularly pertinent given the likely increase in Wiltshire Council’s housing requirement, with the recent Government consultation on changes to the Standard Method for housing requirement suggesting that Wiltshire will need to deliver 911 more homes per annum than is currently required. While the future increase in housing numbers is not directly pertinent to the Neighbourhood Plan, the direction of travel demonstrates the importance of maximising land efficiency, particularly given the under delivery of housing in Trowbridge in recent years will no doubt put pressure on nearby villages such as Southwick to accommodate growth within the emerging Local Plan. Ultra-low density development now will likely lead to greater levels of urban sprawl in the future.

It is further noted that the Neighbourhood Plan anticipates that this site will deliver 30% affordable housing. However, as stated above, the Government has recently consulted on changes to the current planning system which suggests a likely change to increase the threshold at which affordable housing is required, to sites of 40-50 units. This change could come in as soon as autumn this year and would mean that this site would not be required to deliver any affordable housing.

To conclude, the allocation of the Wesley Lane site constitutes piecemeal development which will not deliver the core benefits the village seeks, potentially including the key purpose of the allocation - affordable housing provision. Indeed, it is noted that the plan makes reference to requirements for healthcare, banking, comparison shopping, social facilities, pharmacy, petrol station, a regular post office and allotments. Arguably, without larger scale residential development, these facilities will not be delivered.

It is therefore considered that, in the context of affordable housing need and the wider requirements of the village, Southwick would be far better placed to either identify a larger site which is capable of delivering a greater level of housing now, with the potential for an element of mixed use or to identify an additional site to provide flexibility and to genuinely look to facilitate affordable housing provision above the minimum 8no. units. To progress with very low density development on the Wesley Lane site will only lead to greater greenfield release in the future.

Redrow’s site at Blind Lane (site ref: 30 / S9) is capable of delivering 50-100 dwellings (30% affordable), can potentially include for a mix of uses and can start delivering housing in the short term, (i.e. by April 2026). Redrow also control further land in this area which provides further flexibility. This level of development now will also future proof the need to release further greenfield sites in the future. We therefore urge the Parish to take a long term view to housing delivery in the village, rather than taking a piecemeal approach which will deliver very few benefits for the existing community.

### **Inconsistency of Site Assessment**

It is considered that Redrow’s site at Blind Lane has been unfairly assessed within the Site Selection Report and the Site Options and Assessment Reports for the simple reason that there is more information available for this site due to its planning history.

For example, under the question ‘*Would development lead to the loss of key biodiversity habitats with the potential to support protected species?*’, Wesley Lane is assessed as having ‘low’ potential whereas Blind Lane is assessed as having ‘medium’ potential. However, whereas Blind Lane has a full suite of ecological surveys which has allowed the assessors to come to this conclusion, Wesley Lane does not – it can therefore not be assessed as ‘low’, rather in the absence of surveys, it is just completely unknown.

The Blind Lane site is also scored down due to *'uncertainty that bat mitigation can be delivered on-site in accordance with the TBMS'* whereas ample evidence has been provided to the contrary to support the case that the development can be delivered in accordance with the bat mitigation strategy. Furthermore, as the Steering Group is aware, Redrow has further land within its control which can be used for mitigation purposes if required.

There is also significant inconsistency as to how sites have been scored and treated in relation to site size. In the Site Selection Report, site 27 (stated as 3ha in size) receives a '+++' score whereas site 30 at 1.78ha only received a score of '++' on the basis that it is too large. It also appears to have been scored down on the basis that '15 affordable homes would exceed the minimum level of affordable housing in the HNS on a single site', which would seem a complete contradiction of what the Neighbourhood Plan is supposed to be trying to achieve.

Further, in relation to site 30 / S9, the SOA report (March 2020) recommends *'that a reduced site area is considered by the Steering Group, to the north east nearest the settlement boundary and distant from areas of high flood risk. Any detailed discussions over the precise boundary and housing capacity of the site would be a matter for further discussion between the landowner/ site promoter and the Steering Group through the plan-making process'*.

The Steering Group never made contact with Redrow Homes to discuss this. Redrow Homes has however made multiple attempts to engage with the Steering Group during plan preparation over a number of years but each of these offers have been declined. In this regard, it is not considered that the Steering Group has engaged proactively with promoters to discuss site area or sought the submission of supporting technical reports. Again, using ecology as an example, this has meant that for many sites including Wesley Road, a number of the conclusions drawn are unsubstantiated.

It also does not appear that the Steering Group considered a smaller area for site 30, whereas they did for Site 27. Again, this highlights a significant inconsistency in how the sites have been treated and a transparent process has not been followed.

In summary, when considering the above, the Blind Lane site and the Wesley Lane site would score equally in the assessment and thus it is requested that further consideration must be given to Blind Lane and that both sites should also be assessed in terms of timeframes for delivery. It would also be prudent for the Steering Group to proactively engage with the promoters regarding site area and to ensure the conclusions made are in fact supported by technical evidence. Indeed, for technical matters such as ecology, an absence of information cannot reasonably result in a positive score.

## **Conclusions on Soundness**

On the basis of the above, we consider the plan to be unsound for the following reasons:

- 1 The SEA does not reflect what is actually proposed within the neighbourhood plan;
- 2 The methodology underpinning housing need is flawed;
- 3 As currently drafted, the plan is unlikely to deliver on its key requirements, including affordable housing; and
- 4 The site assessment process is significantly flawed, completely inconsistent and is not transparent, which translates into the proposed plan and allocations being unsound.

We trust that the above concerns will be addressed in the final submission version to Wiltshire Council. We would be very happy to discuss any matter referred to in this letter, or any other concerns, with the Steering Group either in person or over the telephone.



Yours faithfully

A handwritten signature in black ink, appearing to read "Jenny Mitter".

**Jenny Mitter**  
Associate Director