

## **SOUTHWICK NEIGHBOURHOOD DEVELOPMENT PLAN**

### **COMMENTS FORM**

Southwick Parish Council is working with the community to produce a Neighbourhood Plan. Once in force, the Plan will be used in the determination of planning applications.

Before submitting a draft Plan to Wiltshire Council for examination, we are required to conduct a period of formal consultation where your views are sought.

This form has been produced to collect feedback.

If you are completing a comment by hand, and need more space please use the same format as the table so we can identify what your comment relates to.

**Please return this form by *no later than midnight on Monday, 19<sup>th</sup> October 2020.***

By e-mail to: <mailto:southwickclerk@gmail.com>

Or alternatively post to:

Southwick Parish Clerk.  
April Rise,  
81 Studland Park,  
Westbury,  
Wiltshire,  
BA13 3HN

Data Protection.

**PLEASE NOTE:** *Your personal details will not be published as part of the consultation response, but anonymous comments will not be actioned so please provide personal details to accompany your comments. Communication regarding progress of the Plan and amendments to be made will be publicised. No individual responses will be given.*

*Southwick Parish Council have a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Southwick Neighbourhood Plan. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. This data will be passed on to Wiltshire Council for the Regulation 16 Consultation. To gain access to your personal data held by Southwick Parish Council please contact the Parish Clerk – as above.*

Southwick Neighbourhood Plan Regulation 14 Consultation  
Monday 10<sup>th</sup> August 2020 – Monday 19<sup>th</sup> October 2020

**Southwick Neighbourhood Plan**

Ref (office use)

**COMMENTS FORM**

Each new comment should be in a new row. If completing this form digitally, the columns will expand to fit your text. Please save your file using the original file name <NDP R14 Comment\_initials\_MMDD.docx> but replacing “initials” and “MMDD” with your initials and the month and day respectively

**Name (+ any person or organisation you represent), Email address, and Postal address including postcode#.**

#For purposes of clarification and feedback only    \*Sufficient to identify the commented point precisely

| <b>Plan page and paragraph</b> | <b>Comment</b> |
|--------------------------------|----------------|
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## **1. Summary**

1.1. This document sets out the reasons why we object to draft Policy 5b: 'Site Allocation: Land off Wesley Lane' and the methodology used to inform the policy. The Site Selection Methodology used in The Southwick Neighbourhood Development Plan (SNDP) Site Selection Report (April 2020) to allocate a site for residential development is flawed and has not led to the most sustainable site being allocated. We have identified inconsistency and an apparent lack of objectivity in the evaluation of the potential sites with respect to size and density of development, bat sensitivity, the proposed Southwick landscape gap and sustainability.

1.2. Reasoning is presented and used to produce a revised version of Table 5 'Stage 1B Assessment of Sites Within the Southwick Limits of Development' which can be found on page 7 of the SNDP Site Selection Report. The revised version of the table demonstrates that 3 other sites should have received the same score as Site S6 (Land off Wesley Lane) and should be reconsidered prior to confirming whether Site S6 is the most sustainable and suitable site for the proposed residential development.

1.3. In addition, we feel that the recommendations of draft policy 5b do not go far enough in championing high quality and sustainable homes.

## **2. Size and density of development**

2.1. The potential residential development sites in the Site Selection Report were assessed on how they scored against a number of objectives. This section deals with Objective 8, which seeks to: *"Provide development at a size appropriate to Southwick Village that will meet the identified minimum level of affordable housing"*.

- 2.2. Southwick is designated by the Wiltshire Council Core Strategy (WCS) 2015 as a Large Village. WCS Policy CP1 'Settlement Strategy' states that "*Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements*" (my underlining).
- 2.3. Paragraph 10.2 of the SNDP Pre Submission Draft (June 2020) states that "*The Housing Needs Survey, commissioned by the Parish Council and undertaken by Wiltshire Council in 2018 recommends a total of at least 8 affordable new homes. In accordance with WCS Policy 43, which sets a target of 30% of any new build housing in the part of the County to be provided as affordable housing, at least 27 dwellings are therefore required in the Parish*".
- 2.4. Consequently, in accordance with Policy CP1, it would have seemed appropriate for the SNDP Site Selection Report to assess the 6 shortlisted sites on their potential to accommodate approximately 27 dwellings i.e. the number needed to help meet the housing needs of Southwick. Indeed, the requirement to accommodate approximately 27 dwellings has been carried over into draft Policy 5b which states that the site is "*allocated for residential use of approximately 27 homes*". This is despite the fact that Site S6 is has an indicative capacity of 30-60 dwellings.
- 2.5. However, the site selection process did not assess the sites on their ability to accommodate approximately 27 dwellings. Instead the sites (except for Site S6) were assessed on their indicative dwelling capacity/scale of development promoted and 3 sites (S8) Wynsome Street, (S9) Blind Lane and (S10) Fairfield Farm were discounted from further consideration partly on the basis that their indicative capacity/ scale of development promoted (50 dwellings at Sites S8 and S9 and 267 dwellings at S10), was too high.

**2.6. Our first question is: If a need has been identified for 27 dwellings, why is draft policy 5b not worded to limit new residential development to 27 dwellings rather than ‘approximately’ 27 dwellings, which is imprecise and could lead to a quantum of development in excess of the village’s requirement?**

**Secondly if draft policy 5b seeks to provide a site for ‘approximately 27 homes’, why was this restricted dwelling number criteria not applied to all shortlisted sites at the Site Selection stage? This would have enabled Sites S5, S8, S9 and S10 to comply with Objective 8 as they would all have received the same score as Site S6 i.e. Major Positive Effect as they would provide development at a size appropriate to Southwick village, in accordance with WCS Policy CP1.**

2.7. The Site Selection Report’s concern over the indicative capacity/scale of development proposed for each site appears to be linked to the adopted Trowbridge Bat Mitigation Strategy (TBMS), which requires new developments on greenfield sites outside of the development boundary to set aside land to mitigate for 100% of the land lost to the development footprint.

2.8. Page 38 of the Site Selection Report states that Site S8 has a dwelling capacity of 50 dwellings but is rejected from further consideration on page 9 of the Site Selection report as *“There is also uncertainty that bat mitigation can be delivered on-site in accordance with the TBMS to facilitate the scale of development that has been promoted (my underlining) and ensuring the development would be in-keeping with the low density of the surrounding development”*. Site S9 also has an indicative capacity of 50 dwellings and is discounted for the same reason as Site S8. If limited to approximately 27 dwellings, all the shortlisted sites could accommodate this scale of development and leave 100% of the developed footprint of the site for bat mitigation measures. Turning to the question of whether these developments

would be *“in keeping with the low density of the surrounding development”*, typically, low density development is classified as between 25-30 dwellings or per hectare (dph). At 30 dph (as per AECOM suggestion in para 2.24 of the Site Options Report March 2020) built area + 100% mitigation area (=15dph average) even the smallest shortlisted site (S9) could accommodate 27 homes and 100% mitigation area .

- 2.9. As an aside, it is not clear why an arbitrary line been drawn across Site S9 to restrict the proposed developable area to 1.78 hectares? Planning application 16/12279/OUT at Blind Lane was based on a site of 4.59 hectares so the landowner must have control over the whole site. If the Parish Council deem a development of 30dph to be too high density, why could there not be negotiation with the site owner for a marginal increase in site size to allow for a reduction in dph? We assume the site owner/promoter would prefer their site to go forward in the SNDP for 27 houses than not go forward at all?

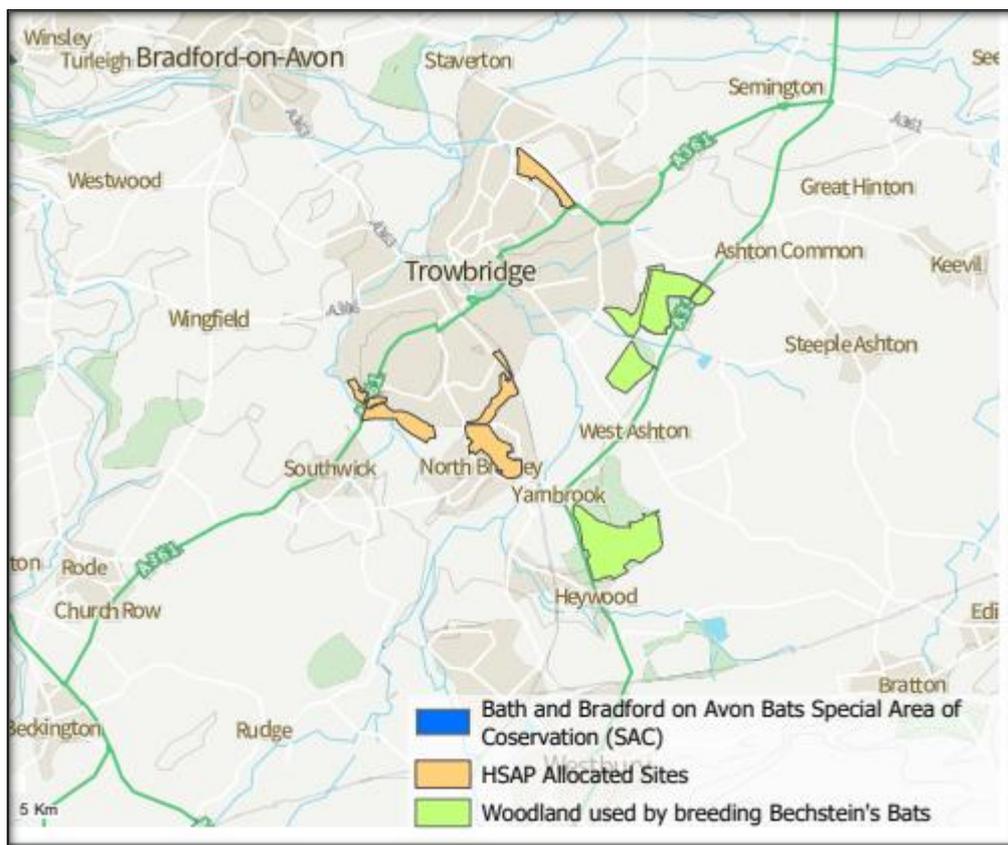
#### **Conclusions in relation to Objective 8**

- 2.10. In summary, WCS Policy CP1 confirms that new development in Large Villages should be limited to that required to meet the housing requirements of the village. The housing requirement for Southwick has been identified as at least 27 houses and draft Policy 5B of the SNDP Pre Submission Draft (June 2020) promotes Site S6 ‘Land off Wesley Lane’ for approximately 27 homes. This restriction on dwelling numbers has been imposed despite the site’s indicative capacity being 30-60 homes. If this dwelling restriction had been applied to Sites S8 and S9, they could also provide the housing requirement of the village, at a low density and accommodate the space required for bat mitigation on site. Site S10 would also not have been discounted on the basis of that it would *“deliver far in excess of that which is limited development in the context of Southwick”*.

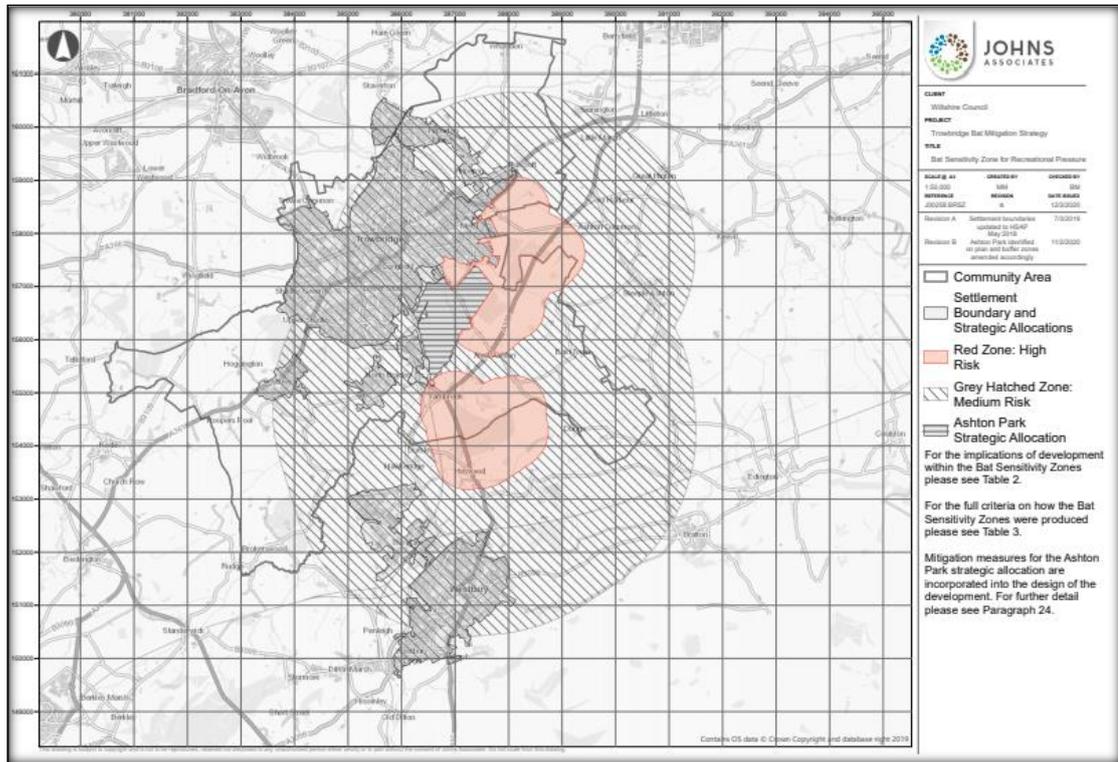
In conclusion, policy 5b should be revised to limit residential development to 27 homes and Sites S8, S9 and S10 should have received a 'Major Positive Effect' score for Objective 8 and should be re-evaluated based on their potential to accommodate at least 27 homes.

### 3. Bat sensitivity

3.1. In addition to being discounted on the basis of indicative capacity and the scale of development promoted, Sites S8 and S9 were also discounted on the basis of their location within an area designated in the TBMS as a 'Bat Sensitivity Zones for Recreational Pressure'. In response to this, this section looks at Objective 1, which seeks to: *"Protect and enhance the sensitivity of the SAC as well as habitats and feeding grounds of protected bat species"*. The map extract below, from Page 5 of the TBMS shows the location of core woodlands for Bechstein's bats in green, to the south and south east of Trowbridge.



3.2. Whilst all 6 shortlisted sites are located within the ‘medium risk’ zone for Bat Sensitivity Zones for Habitat<sup>1</sup>, Sites S8 and S9 are also located within the TBMS ‘Bat Sensitivity Zones for Recreational Pressure’ of core roosts. The extent of this Zone is shown as a grey hatched area on TBMS Figure 5 and set out below.



3.3. Para 133 of the TBMS explains that the grey hatched zone represents the areas where new residential development is expected to result in increased recreational pressure on key woodland bat sites. It is assumed this means that the closer new development is to a key woodland bat site, the more likely the inhabitants are to visit the bat site, thereby causing recreational pressure.

3.4. Whilst location in the Bat Sensitivity Zones for Habitat requires 100% mitigation provision for greenfield habitat loss, location within the Bat Sensitivity Zones for Recreational Pressure

<sup>1</sup> All of the 6 shortlisted sites are within the Yellow ‘medium risk’ zone for Bat Sensitivity Zones for Habitat where Table 7.1 of the TBMS states that development “could lead to the Loss and/or degradation of habitat of importance to Bechstein’s, greater horseshoe and lesser horseshoe bats for foraging, commuting and roosting”.

merely requires that in addition to mitigation provision, a payment to be made to the Local Authority scheme for mitigating effects from recreational pressure, which *may* arise as the result of the proximity of new development to key woodland bat sites.

3.5. Page 8 of the SNDP Site Selection Report (April 2020) states that *“3 of the options (26(S5), 27(S6) and 31(S10) are not within the Bat Sensitivity Zones for Recreational Pressure of core roosts whereby residential development in these locations would mean that such impacts can be avoided in the first place. Recreational impacts on bat populations in core woodlands can be avoided as the site is located outside of the ‘Grey Hatched Zone’”*.

3.6. The above statement is incorrect as there is no guarantee that inhabitants of new homes within the Zone of Recreational Pressure would visit the Core Woodlands whilst inhabitants of new homes just outside of this Zone would not. Therefore, the SNDP’s conclusion in relation to Sites S5, S6 and S10 that *“Recreational impacts on bat populations in core woodlands can be avoided as the site is located outside of the ‘Grey Hatched Zone’”* is nonsense as allocating a site within the Zone of Recreational Pressure would not automatically lead to recreational impacts just as allocating a site just outside of the Zone of Recreational Pressure would not automatically avoid recreational pressure. This is particularly true within the context of a village where the range of distances between the Core Woodlands for bats and each potential site is negligible. Essentially, it will depend on whether the new inhabitants enjoy visiting woodland and if they do, they will visit woodland whether they live inside the grey hatched zone or outside of it. In any case, given the distance of the key woodlands from Southwick (see map extract from page 5 of the TBMS above), residents of Southwick will need to drive to the woodlands.

3.7. As a result, in terms of scores allocated for Objective 1, as long as sites could offer the required 100% mitigation for greenfield habitat loss within the allocated boundary, they

should have been allocated a 'Minor adverse effect' as mitigation measures are achievable to reduce the significance of effects on bats. Whether the site is within or within the Zone of Recreational Pressure should have no bearing on the suitability of the site for residential development as merely requires a payment to be made to the LPA.

**3.8. In conclusion, location within the Zone of Recreational Pressure is not a sound planning reason for dismissing potential sites for residential development and all the shortlisted sites should have been allocated a 'Minor adverse effect' as mitigation measures are achievable to reduce the significance of effects on bats. Therefore, the sites should be re - evaluated on the basis of this scoring.**

#### **4. Southwick Landscape Gap**

4.1. Dismissing sites on the basis of the harm they may cause to a proposed landscape designation, is considered premature and not sound planning practice. Draft Policy 1 'Landscape Setting Gap' of the Pre Submission Draft June 2020 seeks to ensure that Southwick remains distinct from Trowbridge and proposes to establish a landscape setting gap. At present, Southwick is not covered by any statutory or non statutory landscape designations. Therefore, during the Site Selection Stage, no weight should have been attributed to whether a potential site was inside or outside of the proposed landscape setting gap. However, Site S8 was dismissed partly due to its location in the proposed Southwick Gap as *"development of the site may also set precedent for further growth into the open countryside, extending the settlement towards Trowbridge"*.

4.2. The Landscape and Visual Setting Analysis prepared by Indigo for the Southwick Neighbourhood Plan Steering Group (Feb 2018) concluded in Section 6.0 that *"Any development west of Lambrok Stream should be restricted to maintain a 'necessary' gap here. This area is considered strategically important both for its separation and landscape setting*

*function as well as sensitivity due to the presence of the Southwick Court Farm Listed Building and biodiversity considerations (dark corridors for bats). Any development to the east of Lambrok Stream should respond to the site constraints and incorporate the landscape mitigation recommendations outlined in Section 5.0. The Analysis report goes on to say that “It should be noted that the recommendations do not exclude all development taking place within the Landscape Gap”.*

4.3. Draft Policy 1 diverges from the Indigo Report recommendations and states that *“no development will be permitted in the Southwick Landscape Setting Gap shown on the policy map except in accordance with Wiltshire Core Strategy Policy”*. Site S8 is given a ‘moderate adverse effect score’ for Objective 5<sup>2</sup> despite being located to the east of the Lambrok Stream, which Indigo considered to be less strategically important in terms of its separation and landscape setting function than land to the west of Lambrok stream.

4.4. Although not within the proposed Southwick Landscape Gap Site S10 was also partly discounted on the basis that *“development of the site may lead to coalescence between Southwick and Hoggington whilst also setting precedent for further growth into the open countryside to the north west of the NP Area”*.

4.5. However, if the approach of restricting development to approximately 27 houses had been applied to Sites S8 and S10 as it has to S6, it is clear that this level of development would retain more than sufficient space between Southwick and Trowbridge, to ensure that the Southwick Landscape Gap (if endorsed) could provide a useful role and prevent unacceptable visual and physical coalescence .

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<sup>2</sup> Conserve and enhance the landscape gap providing a separate village identity and sense of place from that of Trowbridge.

4.6. In summary, dismissing sites on the basis of their location within a proposed landscape designation, not yet endorsed by Wiltshire Council is not considered a sound planning reason. Sites S8 and S10 should be re-evaluated on the basis of their suitability to accommodate approximately 27 dwellings, irrespective of their location in relation to the proposed Southwick Gap.

## 5. Sustainability

5.1. The Parish Council have promoted Site S6 on the basis that it is more sustainable than the other potential sites but in planning terms it is the least sustainable site as it is the furthest from Trowbridge town centre, which given the lack of facilities in Southwick is the main service centre for Southwick residents. It is a fact that the further residents live from facilities, including in this case Trowbridge College and the two Trowbridge Secondary schools, the less likely they are to walk to them.

5.2. In addition, Table 5 on Page 7 of the Site Selection Document gives Site S6 a 'minor adverse' score for Objective 6<sup>3</sup> on the basis of its proximity to the Listed Building at Blue Barn Farm and the agrarian setting of the farm. Aside from site S7 (Blue Barn Farm itself) all the other potential sites received a '0' neutral or no effect score for Objective 6.

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<sup>3</sup> Objective 6: Protect, maintain and enhance any heritage designations in the Parish that make up the historic environment.

## 6. Summary of objections and request for re evaluation of Sites

6.1. Following the evaluation of the site selection methodology, it is requested that sites S8, S9 and S10 are re evaluated based on their suitability to accommodate approximately 27 houses and not on their ability to accommodate the scale of development for which they have been promoted. It has been shown that the 3 sites could accommodate approximately 27 houses, at a density suitable for the surrounding area, and provide 100% of the developed area for bat mitigation. Therefore, these sites meet Objective 1 of the Site Selection Criteria and accord with Policy CP1 of the Wiltshire Core Strategy.

6.2. It has also been shown that being within or outside of the Bat Sensitivity Zone for Recreational Pressure would have no bearing on whether the inhabitants of the new houses visit the key woodlands to the east and south east of Trowbridge or not, particularly given the proximity of the potential sites to each other and the distance of the sites to the key woodlands. Therefore, sites should not have been discounted on the basis of being within the Bat Sensitivity Zone for Recreational Pressure.

6.3. The Southwick Landscape Gap is not yet endorsed, therefore sites should not have been rejected on the basis of what may become policy in the future. In any case, if development was restricted to approximately 27 homes, that this level of development would retain more than sufficient space between Southwick and Trowbridge to prevent physical coalescence.

6.4. In summary, we object to draft Policy 5b as due to a flawed site selection methodology it has put forward the least sustainable site for residential development. Development of Site S6 may also have a negative impact on a listed building and its setting. The site selection methodology has discounted more sustainable sites on the basis of reasons which can be overcome, by restricting the size of the development to that identified as required for Southwick.

6.5. The information presented above can be used to recreate the Table 5 from the SNDP Site Selection Report (April 2020) (see below). This revised table gives a very different conclusion of the relative merits of the potential sites to the version in the Site Selection document. It can be seen that if the site selection had been based on a limited number of dwellings and had not attributed weight to the Bat Sensitivity Zones for Recreational Pressure and Southwick Gap, Sites S8, S9 and S10 would receive the same score as Site S6 for all objectives except objective 6. Site S6 receives a 'minor adverse' score for objective 6 whilst Sites S8, 9 and 10 have a neutral score, therefore for this objective, Site S6 fairs less well than the other sites.

**Revised Scoring Table**

| Objective/Site     | 1 | 2 | 3 | 4 | 5 | 6 | 7  | 8   |
|--------------------|---|---|---|---|---|---|----|-----|
| S5 Frome Road      | - | - | - | - | - | 0 | -- | +++ |
| S6 Wesley Lane     | - | - | - | - | - | - | -  | +++ |
| S8 Wynsome St      | - | - | - | - | - | 0 | -  | +++ |
| S9 Blind Lane      | - | - | - | - | - | 0 | -  | +++ |
| S10 Fairfield Farm | - | - | - | - | - | 0 | -  | +++ |

6.6. Based on our comprehensive review of the Site Selection Document and AECOM reports, it is very difficult not to conclude that the evaluation and scoring of the sites presented in the Site Selection report is at best inconsistent and lacking in objectivity and at worst, a deliberate attempt to skew the scoring system to allocate a pre determined site for policy 5b. Other suitable sites were dismissed on grounds which could be overcome by agreeing a lower number of dwellings with the site promoter (as appears to have been the case with Site S6) or dismissed on the basis of location within the Bat Sensitivity Zones for Recreational

Pressure, or within a proposed landscape gap. Neither of these are sound planning grounds to dismiss sites.

6.7. Finally, whilst it is outside the remit of this report to speculate on the process of selecting a site for policy 5b, it is worth noting that a potential conflict of interest may have existed within the SNDP Steering Group committee. The chair of the SNDP steering group lives opposite site S9, a site that in his previous capacity as chairman of 'Save Our Southwick' he campaigned vociferously against the 2016 planning application on. His house was for sale during and at the time of publication of the SNDP and if Site S9 had been promoted in the draft SNDP, this may have negatively affected the sale of the property?

## **7. Quality, design and sustainability of housing**

7.1. Irrespective of which site finally goes forward to be allocated for residential development, it is felt that Policy 5b could be strengthened to offer a better quality development for Southwick.

7.2. For example, the policy requires the site to *"promote a range of high quality and sustainably constructed homes that meet required levels of sustainability in accordance with Policy 41 of the Wiltshire Core Strategy (WCS)"*. The WCS was adopted in 2015 and significant progress has been made in terms of sustainable construction since this time. For example, Policy 41 requires homes to achieve at least Level 4 of the Code for Sustainable Homes but the Code for Sustainable Homes has been superseded.

7.3. Ideally, policy 5b should require homes to meet the forthcoming 'Future Homes Standard', which will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency. Given that it is a fact that whichever site is chosen residents will use cars as their main means of accessing facilities, The policy should also insist

on the inclusion of electric vehicle charging point for every dwelling, to encourage electric vehicle ownership.

7.4. There is also a considerable demand for self/custom built development. Could some of the site be allocated for self build plots, thereby enabling self builders to build homes which meet their requirements instead of having to buy a home which doesn't necessarily suit their needs but is all that is available?