

**North Bradley Parish Council**

**Formal Consultation Response**  
**To**  
**Wiltshire Housing Site Allocations Plan**

**September 2017**

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## Glossary of Terms

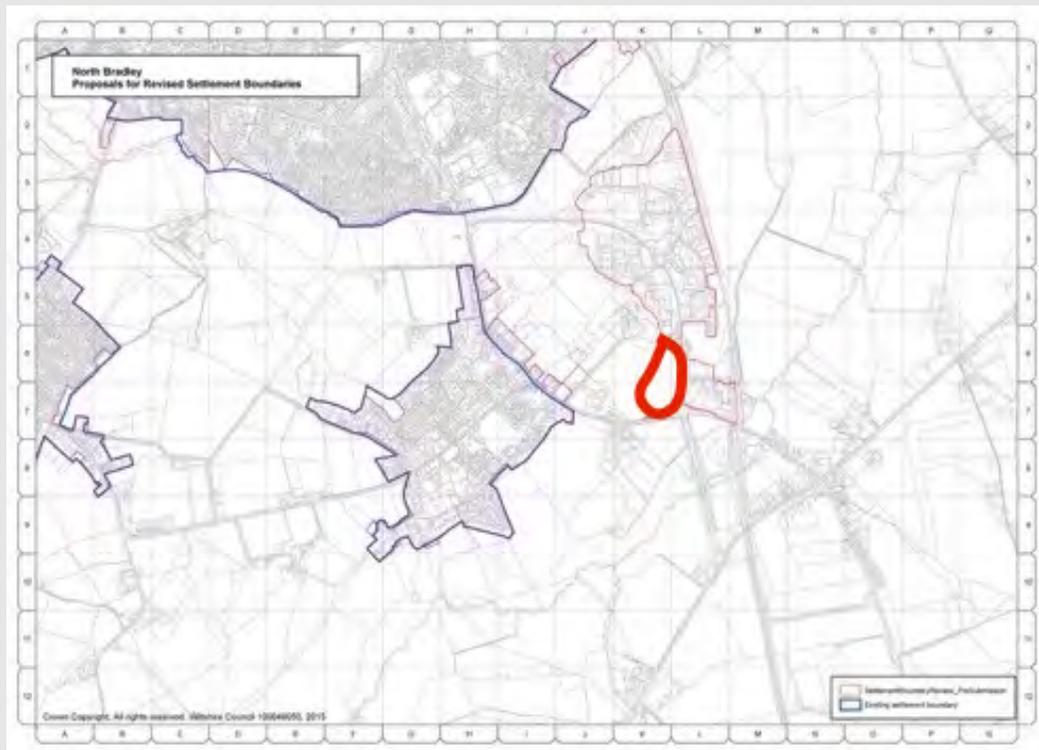
<b>Acronym or Term</b>	<b>Definition</b>
<b><i>DCLG</i></b>	Department for Communities and Local Government
<b><i>HNS</i></b>	(Rural) Housing Needs Survey
<b><i>HRA</i></b>	Habitat Regulations Assessment
<b><i>HSAP</i></b>	Housing Site Allocations Plan (Formally known as the Sites DPD)
<b><i>LPA</i></b>	Local Planning Authority (Wiltshire Council)
<b><i>NB</i></b>	North Bradley
<b><i>NDP</i></b>	Neighbourhood Development Plan
<b><i>NPPF</i></b>	National Planning Policy Framework - 'The Framework' sets out planning policies for England
<b><i>PPG</i></b>	Planning Policy Guidance
<b><i>Qualifying Body</i></b>	Body authorized by law to create a Neighbourhood Plan. Normally the Parish Council.
<b><i>SA</i></b>	Sustainability Appraisal – Appraisal of the impacts of a plan to include socio-economic and environmental factors.
<b><i>WCS</i></b>	Wiltshire Core Strategy

## 1.0 Introduction

- 1.0 This is the formal response of North Bradley Parish Council to the 10-week consultation on the above draft plan. The Parish Council OBJECTS to the Housing Site Allocations Plan (HSAP) and in particular two of the three sites suggested for allocation within the Parish.
- 1.1 While the Parish Council routinely comments on such consultations, the community are currently engaged in producing a Neighbourhood Plan (NDP), and this gives an additional significance to the following comments, since good planning practice and Government guidance demands that good co-ordination is maintained between emerging strands of policy and that, wherever possible, conflicts should be reconciled and aims harmonised. Paragraph 157 of the NPPF says: *Crucially, Local Plans should ... be based on co- operation with neighbouring authorities, public, voluntary and private sector organisations.* '. It does not seem to the Parish Council as if the standards set in the NPPF or in Planning Practice Guidance have been met in the preparation of the HSAP.
- 1.2 The HSAP includes not only sites, but also proposes changes to settlement boundaries. Such boundary changes have consequences for the application of policy, for example in determining where a presumption in favour of certain development should occur. The following response deals with the settlement boundary issue first before moving on to consider the sites.

## 2.0 Boundary Changes

- 2.0 The boundary reviews generally consist of ‘good housekeeping’ in terms of updating boundaries to take in areas of development that are logically part of the village and parish of North Bradley.
- 2.1 It is noted that the boundary of the White Horse Business Park (WHBP) has been moved westwards (as indicated in red on the map below). The Parish Council would normally have objected to this as an encroachment into the Parish, However, the area is not indicated as being suitable for saving as part of the proposed landscape setting policy as identified in the Landscape Setting report that supports the HSAP (see Appendix 2). The Parish Council is aware of the need to argue from sound evidence, and also values the local employment that could be provided by an expansion of the WHBP, and therefore does not object to this expansion, subject the larger area identified in the emerging NDP being protected. It does suggest however that landscaping be provided as indicated in the Landscape Setting Report main map (see Appendix 2 and section 3 below).



### 3.0 DPD and NDP Sites

- 3.0 It is regrettable that, despite the LPA's Link Officer being asked to provide maps indicating the landscape policy of the NDP on 19<sup>th</sup> April, (see Appendix 1 for e-mail) that the implications of the landscape setting policy for site selection for the HSAP were not communicated to the Spatial Planning HSAP team. Additionally it is a pity that the Steering Group were not in any case directly consulted about site selection in their area at the site selection stage, before the HSAP went out to consultation on 10<sup>th</sup> July. Had this happened, the HSAP team would have known that the area in which they have allocated sites, is likely to be subject to a landscape policy, reflecting the wishes of the community, that retains open space between Trowbridge and North Bradley.
- 3.1 The Parish Council is also concerned about the validity of the planning argument in the HSAP – with some of the assertions appearing to be based on rather thin evidence.
- 3.2 Overall, there is, unfortunately, a fundamental conflict between the emerging HSAP and NDP. However, as these are both at an early stage, it may yet be possible to harmonise them. Nevertheless, as things stand, the Parish Council finds itself in the position of having to OBJECT to the emerging Housing Site Allocations Plan on the following Grounds:
- 3.3 **Failure in Duty to Cooperate**  
The HSAP has fallen short of the standards required by the 2011 Localism Act, which amended the 2004 Planning and Compensation Act, and subsequent Planning Practice Guidance and is therefore flawed and likely to be UNSOUND.

*'The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan'. Paragraph: Planning Practice Guidance, Neighbourhood Plans, 009 Reference ID: 41-009-20160211.*

3.4 The NPPF (Para. 155) says:

*Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.*

3.5 The North Bradley NDP has in fact been developing since November 2016. Early community engagement took place in February and March 2017. After conducting a considerable amount of research, Regulation 14 consultation for the NDP is now imminent and the NDP will shortly be submitted for SEA and HRA Screening. Community engagement revealed a strong desire to preserve the identity and setting of North Bradley village and to prevent it from losing its identity as a suburb of the principal settlement. The main evidence base for the plan is contained within a Scoping Report, which together with a professional Landscape Report (the latter given here in full as Appendix 2) indicate multiple reasons for retaining a landscape setting gap between Trowbridge and North Bradley on the grounds of setting, preventing coalescence that would lead to loss of local distinctiveness, and harm to biodiversity. Indeed the NDP is encouraged to create such a policy by virtue of paragraph 5.150 of the Wiltshire Core Strategy:

*'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.'*

Given the existence of paragraph 5.150 and the emergence of the HSAP, it is surprising that Wiltshire Council did not realise the additional importance of ensuring co-operation with local NDP teams of the villages around Trowbridge. However, this may reflect a wider problem; the fact that Wiltshire Council does not seem to take neighbourhood planning as seriously as the regulations require.

3.6 It is accepted that some consultation with Parish Councils did take place, but Neighbourhood Plan Steering Groups are semiautonomous bodies, often made up of community members not members of the Parish Council. Simply consulting a Parish Council is no guarantee that this will result in effective consultation of any neighbourhood plan group. No effort was made to directly reach out to any NDP group in order to ascertain whether conflict was likely to arise between sites emerging there and those that could be considered for the HSAP.

3.7 The Wiltshire approach seems to fall short of what Planning Practice Guidance requires. PPG says:

*‘The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone. Local planning authorities that cannot demonstrate that they have complied with the duty will fail the independent examination process’.* Paragraph: 009 Reference ID: 9-009-20140306

3.8 It goes on:

*‘Cooperation should take place throughout Local Plan preparation – it is important not to confine cooperation to any one point in the process.*

*Local planning authorities and other public bodies need to work together from the outset at the plan scoping and evidence gathering stages before options for the planning strategy are identified. That will help to identify and assess the implications of any strategic cross boundary issues on which they need to work together and maximise the effectiveness of Local Plans. After that they will need to continue working together to develop effective planning policies and delivery strategies. Cooperation should continue until plans are submitted for examination and beyond, into delivery and review.*

*Local planning authorities should bear in mind that failure to demonstrate compliance with the duty at the Local Plan examination cannot be corrected after the Local Plan has been submitted for examination. The most likely outcome of a failure to demonstrate compliance will be that the local planning authority will withdraw the Local Plan’.* Paragraph: 012 Reference ID: 9-012-20140306

3.9 We have to ask, why was a simple audit not undertaken of emerging NDP sites? This could have taken the form of a questionnaire to all groups. Alternatively a working group could have been formed in all areas where areas were proposed including representatives of both NDP groups and the LPA. This would have indicated sites and possible conflicts at an early stage. Unfortunately the answer to this question seems to suggest that the Wiltshire Council’s attitude to neighbourhood planning as a whole may be the cause.

3.10 **Incorrect approach to neighbourhood planning in site selection**

Verbal communication with the LPA seems to indicate that they believe a neighbourhood plan is ‘not relevant’ until it reaches the Regulation 16 stage. This is incorrect. It is disturbing that the LPA seems to believe that a neighbourhood plan about to embark on Regulation 14 Consultation is not worthy of consideration in site selection. If this really is the attitude of Wiltshire Council then it seems to conflict with that of the Government. Annex 1. Paragraph 216 of the NPPF says:

*From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:*

- *the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- *the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

3.11 Planning Practice Guidance Neighbourhood Planning para 07 adds:

*‘An emerging neighbourhood plan may be a material consideration. .... Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies.... Decision makers should respect evidence of local support prior to referendum when seeking to apply weight to an emerging neighbourhood plan. ....It is for the decision maker in each case to determine what a material consideration is and what weight to give it.’*

3.12 Wiltshire Council might say that they have complied with the above wording, in determining that the North Bradley NDP is not worthy of consideration at the site selection stage of the HSAP. However, the decision made is clearly wrong when one considers its effects. In the case of the North Bradley Neighbourhood Plan, these include a fundamental conflict between the emerging policies of both NDP and HSAP. This cannot be good planning and it suggests that the way the HSAP was developed was faulty.

3.13 The advice given in PPG is clear:

Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, as part of the development plan, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan’ PPG Paragraph: 007 Reference ID: 41-007-20170728

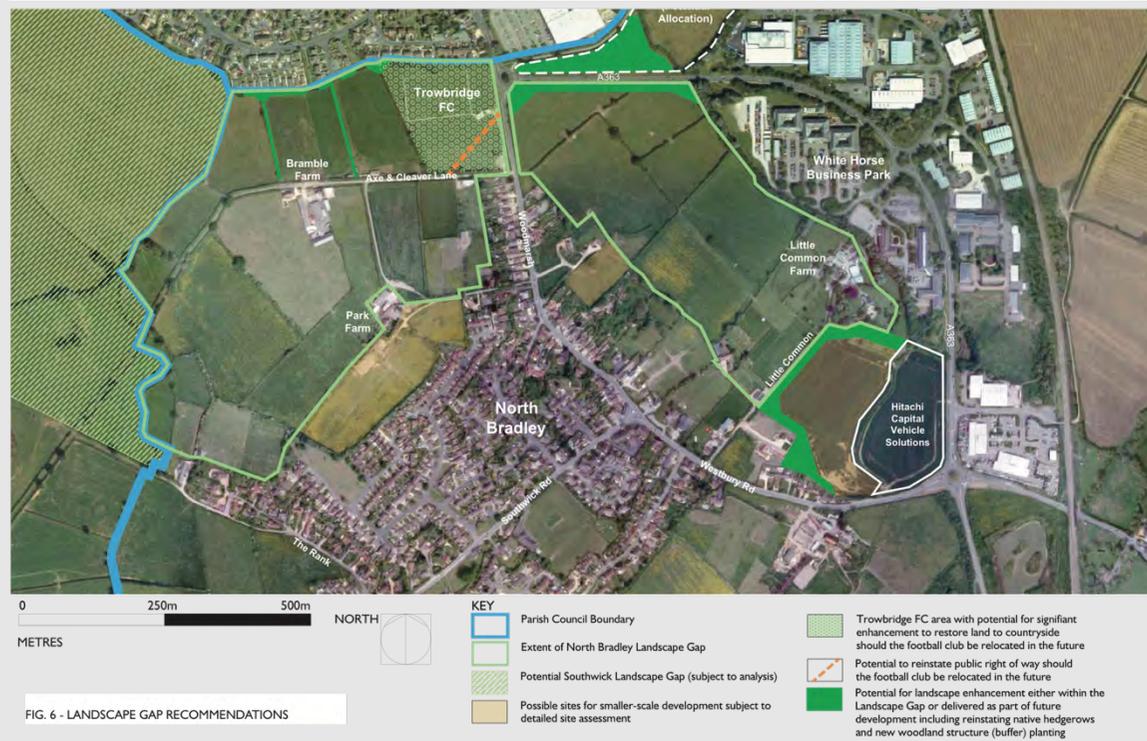
- 3.14 In order to avoid conflicts such as the one that has arisen, and given the stakes in this case, it seems evident that any emerging neighbourhood plan likely to conflict with the sites selected by the HSAP should be taken account as soon as possible, and weight duly attached according to its stage of progress. As it is, there was no direct consultation between the HSAP and neighbourhood plan groups and the entire matter of neighbourhood planning took up just 3 paragraphs in the HSAP.
- 3.15 Topic Paper 2, paragraph 6.6 states that in Step 3 of the site selection procedure, note was taken ‘*..of how work on Neighbourhood Plans has progressed since first considered at stage 2 and the extent to which they may contain housing proposals of their own.*’ However, this DID NOT occur at North Bradley where no contact was made by the LPA to the NDP team.
- 3.16 **HSAP is based on questionable argument for housing growth**  
The Wiltshire Core Strategy indicates that additional housing is required for growth in Trowbridge. Core Policy 29 sets out that an additional 960 dwellings should be developed *at the town ...*’ and the HSAP itself is foreshadowed; ‘*Further land for housing development at Trowbridge will be identified in the Housing Site Allocations DPD...*’. However at no point is the fact that these houses might have to be accommodated within North Bradley parish mentioned – an example of poor drafting that effectively denied the community awareness that this might happen.
- 3.17 However, there is a more serious objection to the HSAP’s interpretation of the above policy. The HSAP states (4.52)  
*‘...housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220’.*
- But, this assessment is based on the un-verifiable assumption that the Ashton Park will be much slower in delivery than anticipated and that sites for additional homes therefore need to be identified to avoid a shortfall in housing land supply later in the plan period. In fact the HSAP acknowledges that of the projected shortfall of 1220, fully 1000 come from the assumption that 1000 homes now will not be delivered within the WCS plan period (up to 2026) as thought.
- 3.18 However, this assumption about Ashton Park relies simply on the word of the developers who supplied this estimate to the LPA. This cannot be considered to be reliable. The developers may have a vested interest in encouraging the belief that delivery will be slow (so as to get other land allocated in the HSAP). They are certainly not equipped with a crystal ball and cannot therefore accurately predict delivery ahead.

- 3.19 This is particularly relevant at the present time, which is one of great economic uncertainty, as the UK struggles with negotiations on Brexit. The share prices of housebuilders have been hard hit by Brexit (making it more difficult for them to raise finance for new housing projects) and many have announced that they are putting new projects on hold. Yet recent announcements by opposition parties in the UK suggest that Brexit, least of all a Hard Brexit, may not even happen. The truth is no one knows how Brexit will pan out, yet the HSAP would have us believe that housing developers can accurately predict delivery for up to 9 years ahead! This seems very unlikely, if not impossible. We then have to consider what would happen should the developers simply change their minds if circumstances change. This is not at all unlikely; should the Brexit logjam be suddenly released (for example if an agreement was reached to stay in the EU or at least the customs union) then the circumstances and attractiveness of development at Ashton Park could change dramatically and almost overnight. This would pump 1000 homes into the housing supply far earlier than the HSAP predicts.
- 3.20 Given the questionable basis on which the site allocation proposals are based – namely the actual need for the scale of development proposed – it has to be questioned whether the number and size of sites allocated is actually needed to meet the needs of Trowbridge.
- 3.21 **Failure to fully consider impact of sites proposed on setting of North Bradley**  
As shown in the Landscape Setting Report commissioned for the NDP, a *meaningful* gap between Trowbridge and North Bradley needs to be maintained in order to preserve the rural character and setting of the village. If this is not done, then it will lead to the inevitable coalescence of Trowbridge and North Bradley, creating an urban sprawl and destroying the village character for which this part of Wiltshire is famous and which the community loves.

3.22 While development must take place to provide necessary housing, this should not be at the expense of destroying character and sense of place. If repeated across Wiltshire this would lead to an anonymous sprawl with everywhere becoming simply ‘somewhere on the way to somewhere else’. It is the individual character of settlements that residents value and which underpin the county’s tourism and leisure industries. Development which destroys this is not sustainable since it involves handing on to our descendants something worse than what we ourselves inherited.

3.23 The Landscape Setting Report is given in full as Appendix 2.

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



3.24 Nowhere in the supporting documentation (e.g. Topic Papers 2 and 4) of the HSAP is it clear that the impact of the proposed sites on North Bradley's setting was properly considered. Indeed the entire process seems to have been a 'top-down' strategic level exercise without the benefit of local knowledge that better integration with the neighbourhood plan process might have achieved.

3.25 **Faulty SA**

Part of the sites selection procedure is based on an SA (Sustainability Appraisal), The Sustainability Objectives for this were:

**Table 5.1 Sustainability objectives**

<b>Sustainability objectives</b>	
1.	Protect and enhance all biodiversity and geological features and avoid irreversible losses
2.	Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
3.	Use and manage water resources in a sustainable manner
4.	Improve air quality throughout Wiltshire and minimise all sources of environmental pollution
5.	Minimise impacts on climate change
	a. through reducing greenhouse gas emission
	b. through reducing our vulnerability to future climate change effects.
6.	Protect, maintain and enhance the historic environment
7.	Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place
8.	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
9.	Reduce poverty and deprivation and promote more inclusive and self-contained communities
10.	Reduce the need to travel and promote more sustainable transport choices.
11.	Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth
12.	Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce

- 3.26 Objective 7 should have enabled the plan makers to determine that two of the sites they proposed were harmful to the setting of North Bradley. However, in Section 7.10.74 of the SA itself (regarding Land Off A363 at WHBP) we find no mention of the impact on the setting of North Bradley at all, except for a statement that:

*‘The site is situated to the immediate east of North Bradley village and west of the White Horse Business Park. The land comprises a series of agricultural fields / informal open space and, as such, would not maximise the use of previously developed land’.*

The score given for this site against Sustainability Objective 7 records only minor adverse effects on landscape. This completely ignores the sensitivity of the area in landscape setting terms as established by WCS paragraph 5.150, to which it fails to refer, and is clearly wrong in terms of actual impact as is proven by the Landscape Setting Report commissioned for the NDP. A similar error is made for the Southwick Court site. That the SA could have made such fundamental mistakes in scoring brings its entire credibility into question.

3.27 **Value and Reputation of Localism**

At the present time, contrary to the spirit of Localism, Wiltshire Council appear to be pursuing their traditional ‘top-down’ view of planning. This one way street involves lower tier plans conforming rigidly with those in higher tiers. There is little or no room for ideas to flow back upwards, from the community.

- 3.28 There can be little doubt that, should the HSAP proceed on its current basis, then this would cut directly across emerging neighbourhood plans and would impose sites upon them. At the present time conflicts between the HSAP and neighbourhood plans are known to exist at:

Hilperton  
Market Lavington  
North Bradley  
Southwick

It is known that these groups are currently considering making a joint submission to the Inspector should the HSAP be submitted in its current form. There will no doubt be many more groups with similar arguments. The cumulative effect of this will be to significantly degrade public confidence in the neighbourhood planning process in Wiltshire. As neighbourhood plans have so far proved to be at least as good as LPA’s in delivering sites nationally (as DCLG Studies 2015 and 2016 confirm) the ironic effect of this could be to actually slow housing delivery.

### 3.29 **Conflict with WCS Policy 51 Landscape**

The two sites not included in the NDP (Land off A363 at White Horse Business Park and Southwick Court) also conflict with Wiltshire Core Strategy policy 51 (Landscape). This states:

*‘Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures..’*

The proposal of these sites also make the invitation contained within the following part of Paragraph 5. 150 of the WCS very hard to carry through:

*‘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.’*

### 3.30 **Impact on Biodiversity**

Community engagement revealed that local people care about local wildlife. The SA however concludes that the impact of the Site off A363 at White Horse Business Park would not have a significant effect on Bechstein’s Bat. However this seems like an error. Bechstein’s Bat is rare and *any* impact on them must be regarded as serious. The NDP group will be conducting more local research into this issue, including a possible general biodiversity survey.

3.31 **Value and Reputation of Localism**

Localism, especially its more active arm – neighbourhood planning – has the potential to deliver many new homes and in many cases seems to be outstripping traditional local plans as a delivery mechanism. For example a DCLG study in October 2015 (*‘Neighbourhood Planning: progress on housing delivery’*) suggested that Neighbourhood Plans frequently allocated more housing than did their Local Plans. A follow up study in 2016, confirmed this and suggested that the average plan allocated 10% more than their LPA.

3.32 Neighbourhood Planning is therefore valuable, not only because it allows the community a democratic input into the planning process, but because it actually works – delivering more sustainable homes than traditional top-down methods. It should follow therefore that LPA’s should be carefully cultivating this new arm of the planning process. However, in Wiltshire this does not seem the case, with little meaningful engagement leading to confusion and delay. Given the extent of the housing crisis this is most regrettable. **Why was an audit of all neighbourhood plan sites not taken during the site selection process?**

3.33 The problem with the current approach is that it is already leading to dissatisfaction with the neighbourhood planning process in Wiltshire and in North Bradley in particular. If this spreads then collectively it could act as a major deterrent to the entire concept in Wiltshire, leading to substantially less delivery of new housing.

## 4.0 Conclusion

- 4.0 There is no desire on the part of the NDP team to have any conflict between the emerging HSAP and the NDP. The Parish Council accepts the need to contribute towards housing need to Trowbridge. However, it does not agree with the quantum proposed nor the locations of all of the proposed sites. Dialogue is sought with the LPA to discuss revisions which will enable a suitable landscape setting area to be retained, while contributing towards local housing need. This is permitted by planning Practice Guidance, which says:

*A neighbourhood plan can propose allocating alternative sites to those in a Local Plan, but a qualifying body should discuss with the local planning authority why it considers the Local Plan allocations no longer appropriate. In rural areas, all settlements can play a role in delivering sustainable development.* Paragraph: 044 AD: 41-044-20160519

- 4.1 The proposed Landscape Setting Policy for the NDP, based on the evidence of the Landscape Setting Report is given as Appendix 1.
- 4.2 It should be possible to accommodate the growth actually needed for Trowbridge with the desirability of preserving the character and setting of North Bradley, and to this end the NDP accepts one of the sites proposed, that at Elm Grove Farm (200 new homes), but has to reject the others because they conflict with the professional advice obtained by way of landscape appraisal and also with the wishes of the community. It is requested that these sites are withdrawn in order to resolve the conflict between the HSAP and NDP.

### **Elm Grove Farm:**

This site could deliver 200 homes. It is well located, being surrounded by development on 3 sides and is located to the north of the 363 (In landscape terms, as indicated in the North Bradley Landscape Setting Report, this site could be accommodated without significant negative effects on the setting of North Bradley or to biodiversity in the area. It is therefore supported, subject to landscaping conditions in the NDP).

**Southwick Court** (180 houses) and **Land off the A363 at White Horse Business Park** (150 houses) conflict directly with the biodiversity and landscape setting aims of the North Bradley NDP (for Policy 1 of the NDP – see Appendix 3 to this response). This is clearly demonstrated in the Landscape Setting Report given as Appendix 2.

- 4.3 While supporting the Elm Grove Farm site, the Parish Council therefore Objects to the two sites above.

4.4 **In summary** the Parish Council believes that the Housing Site Allocations HSAP, is, in its current form is clearly UNSOUND for the following reasons:

**The process of developing the HSAP demonstrates a failure in the Duty to Cooperate**

This not only a failure to comply adequately with the Localism Act 2011, but also conflicts with one of the Core Planning Principles of the NPPF, namely that; ‘development should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area’. NPPF paragraph 17.

**The HSAP demonstrates an incorrect approach to neighbourhood planning as a whole**

It is clear that Wiltshire Council does not properly engage with neighbourhood planning, seeing it as an additional, almost optional element that has to fit in with the traditional top-down model. There is no recognition that the process should be a dynamic one with real two-way conversation and close linkages. In particular the LPA seems to believe that neighbourhood plans can be safely ignored until they have been submitted for examination. This is incorrect, bad planning and conflicts with Government guidance. This attitude has directly led to the present conflict that exists between the NDP and HSAP.

**The HSAP is based on faulty argument for housing growth**

That housing is needed to support growth at Trowbridge is not disputed. However the quantum now being proposed is far higher than mentioned in the WCS and this seems to relate to the acceptance of an estimate submitted by an interested party. The assumption that Ashton Park will not be delivered in its entirety during the plan period is a fundamental flaw in the calculations used to determine the level of housing which should be allocated. This is particularly unsound given the economic uncertainty in the UK today.

**The HSAP clearly fails to fully consider the impact of the sites proposed on the setting of North Bradley**

The Wiltshire Core Strategy specifically invites neighbourhood plan groups around Trowbridge to consider the future of the landscape gap between them and Trowbridge stating in paragraph 5.150:

*‘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.’*

Having set the North Bradley NDP on this course, Wiltshire Council then allocate three large sites in the very area in question without any direct consultation with the NDP group.

**The SA on which site selection is based is faulty.**

Site selection in the SAP relies heavily on the SA. However this is faulty and fails to consider the landscape impact properly, nor the special circumstances and sensitivity established by paragraph 5.150 of the WCS. In the light of the Landscape Setting Report, the scoring is clearly wrong with the impact on the landscape setting of the village being largely ignored and the impact on landscape being greatly underestimated and scored too low.

**The Sites at Southwick Court and Land Off A363 at White Horse Business Park conflict with WCS Core Policy 51**

Core Policy 51 requires no harm to be done to landscape quality, yet as the Landscape Setting Report for the NDP clearly demonstrates harm would be caused by these two site were they to be permitted.

**Biodiversity**

The fields around North Bradley provide a home for many creatures well known to local residents including bats, mice, birds, rabbits badgers, deer and foxes. The impact on biodiversity seems to have been underestimated and the NDP will be gathering more evidence on this issue.

**Value and Reputation of Localism**

The HSAP as currently drafted is likely to seriously harm the credibility of neighbourhood planning in Wiltshire simply because it appears that neighbourhood plans have been paid scant regard in its creation. This will no doubt act as a deterrent to others currently considering making a plan. How real is Localism when it can be so easily ignored and over-ridden by traditional top-down planning? The lack of a specific site audit direct from the neighbourhood planning groups is a serious omission in the HSAP, and the failure of Wiltshire Council to ‘connect the dots’, linking maps supplied by themselves for a landscape protection area at North Bradley with their HSAP is a serious error.

**4.5 Finally:**

The Parish Council SUPPORTS the site at Elm Grove Farm, in order to deliver necessary housing for Trowbridge, but requests that the sites off the A363 at White Horse Business Park, and that at Southwick Court be removed in order to protect the landscape setting of North Bradley, local biodiversity and the reputation of neighbourhood planning in Wiltshire. Their selection is considered to be unsound for the reasons given.

**North Bradley Parish Council and North Bradley Neighbourhood Plan Steering Group. August 2017.**

## Appendix 1:

**From:** Parish Council [mailto:[parishcouncil@northbradley.org.uk](mailto:parishcouncil@northbradley.org.uk)]  
**Sent:** 19 April 2017 17:46  
**To:** West, Sasha; Spatial Planning Policy  
**Cc:** Burvill, Victoria  
**Subject:** More maps please?

Dear Sasha

I hope you had a good Easter. Could you possibly create two more for us?  
Could you use the attached scan, Recreation Areas 6 to create a map in the same format as others that you've done for us?  
Also, scan X, could we request as a proper map: North Bradley and Landscape Map.

Many thanks and kind regards **Karin Elder**

Clerk to North Bradley Parish Council  
T: 01373 823907  
e: [parishcouncil@northbradley.org.uk](mailto:parishcouncil@northbradley.org.uk) [www.northbradley.org.uk](http://www.northbradley.org.uk) Address: 50 Newtown, Westbury, Wiltshire, BA13 3EF

On 20 April 2017 at 16:42, Burvill, Victoria <[Victoria.Burvill@wiltshire.gov.uk](mailto:Victoria.Burvill@wiltshire.gov.uk)> wrote:  
Dear Karin,

I hope you are well.

I just wanted to let you know that we have received this request for maps. It might be a little while before we can do these, but I will find out when we might be able to do these for you and let you know.

Also, I copied you in on another e-mail to Carol at West Ashton. I'm not sure if I have already talked to you about this or if Dave Cox has, but we think it might be useful if you came in to a meeting with the West Ashton steering group. We would like to go through the neighbourhood planning process and see where you are with it and see where we can support you along the way.

We are looking at dates in the first and third weeks of May at the moment. You are welcome to come along with some other members of the neighbourhood planning steering group. Please could you find out if people think this would be useful and get back to us.

Kind regards  
Vicky

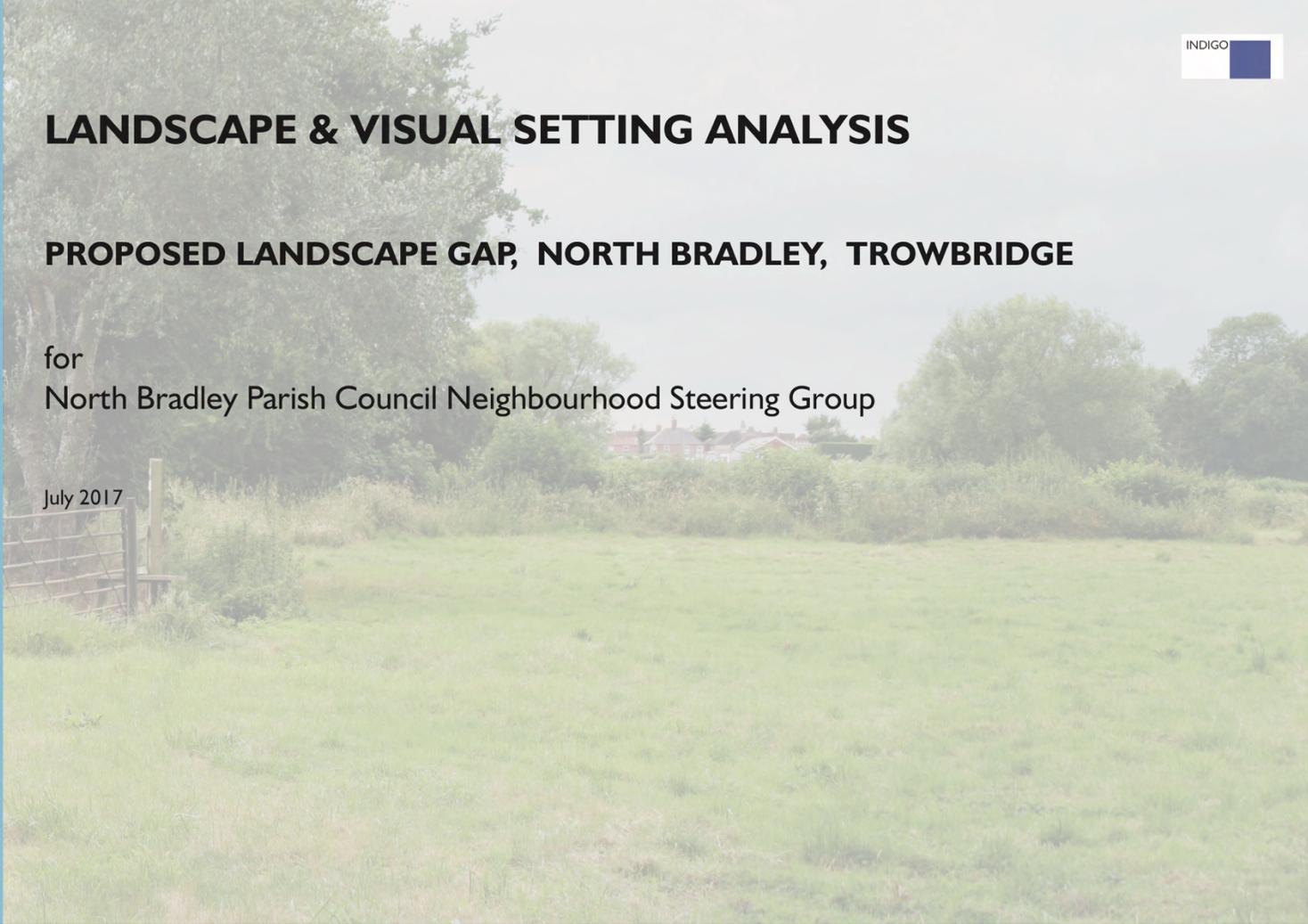


# LANDSCAPE & VISUAL SETTING ANALYSIS

## PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE

for  
North Bradley Parish Council Neighbourhood Steering Group

July 2017



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

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



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# LANDSCAPE & VISUAL SETTING ANALYSIS

## PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE



### 1.0 INTRODUCTION

#### 1.1 INTRODUCTION & BACKGROUND

##### Reason for the report

Indigo Landscape Architects were commissioned by North Bradley Parish Council Neighbourhood Steering Group to undertake a Landscape and Visual Setting Analysis of the landscape area between North Bradley and Trowbridge and make recommendations on the extent of a 'North Bradley Landscape Gap' between North Bradley and Trowbridge. Figure 1 shows the Study Area.

##### Scope of the work

Undertake a desk study exercise to review existing Landscape Character Assessment and designations associated with the area to understand the Landscape Character of the site and its surrounding context. Check public right of way access within the Study Area including footpaths, bridleways, roads, etc.

Carry out a site visit to check / assess the Landscape Character of the Study Area and confirm key views from publicly accessible areas of the surrounding landscape which affect the setting of the village to inform the proposed extent of the 'North Bradley Landscape Gap'.

Following completion of the desk study and site work prepare a Landscape and Visual 'Analysis' report to include the following:

- The landscape context of the land between the village and Trowbridge and in particular that within the potential 'North Bradley Landscape Gap' – looking at physical influences; influences of human activity; and Aesthetic and Perceptual factors.
- Set out the landscape planning context including any relevant landscape-based planning policies / designations / guidelines etc.
- Set out the visual characteristics of the village and surrounding landscape focusing on the setting of the village; separation / coalescence between the village and Trowbridge and the White Horse Business Park; including representative views.
- Undertake a narrative analysis of the issues and make recommendations on the need for and extent of the 'North Bradley Gap' in landscape setting terms.

The Landscape and Visual Setting Analysis was carried out from a range of publicly accessible land within the Study Area. The analysis was carried out at eye level and on foot and included a relevant selection of publicly accessible open space, roads and footpaths.

The site was visited on the 30th June 2017 and the weather was dry but overcast with good visibility. Representative photographs were taken using a standard 50mm lens at eye level.

##### Landscape Gap definition and purpose

Landscape Gaps are spatial planning tools designed to shape the pattern of settlements, they are not countryside protection or landscape designations. They generally command wide public support and have been used with success in previous strategic plans to influence the settlement pattern. Nationally, the most significant application of policy to maintain settlement separation and avoid coalescence is Green Belt Policy.

Previous National Guidance (in PPS's and PPG's) on gaps and green wedges has subsequently been revoked but the importance of maintaining physical separation between settlements and avoiding coalescence is still an important consideration for many communities. For example, maintaining visual separation and protecting the identities of villages was an important policy included within The Idmiston Parish Council Neighbourhood Plan Neighbourhood Plan (2015-2026) as follows:

##### Policy 1 - Village Separation

*For the villages to remain as recognisably separate places, with their own identities, it is critical that these physical and visual breaks between our settlements are retained. Consequently, any development which prejudices the continued separation of our existing villages from each other, and from those in neighbouring parishes, will not be supported.*

The importance of a Landscape Gap is therefore more concerned with its 'setting' function (visual and physical separation) rather than a consideration of intrinsic 'landscape value'; thus, helping to preserve landscape areas which contribute to the setting, identity or backdrop of settlements.

The idea of a 'meaningful gap' is incorporated within the North Warks Borough Council draft Local Plan (August 2016). This forms part of the Council's spatial strategy and seeks to prevent new development from significantly diminishing the extent of a Landscape Gap. Thus, small-scale changes are possible but a core area for protection should be maintained in order to prevent the coalescence of settlements and maintain their identity.

A Landscape Gap should also be a contiguous, uninterrupted, integral whole to be a 'meaningful gap' and not broken or partially subdivided by significant development; thereby undermining its landscape setting function.

Landscape quality and amenity can also contribute towards determining which areas of a Landscape Gap are most sensitive and should also be considered when determining the specific area that constitutes the Landscape Gap.

It is recognised that the provision of significant green infrastructure such as Landscape Gaps offer important recreational, health and landscape benefits to local communities as well as potentially valuable habitat and biodiversity benefits.



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FIG. I - STUDY AREA

**2.0 PLANNING AND LANDSCAPE CONTEXT**

**2.1 INTRODUCTION**

This section of the report looks at the landscape character of the study area with reference to existing studies at a National, County and Regional level; and considers the character of the study area based on the site work undertaken. It then considers the planning context at both National (NPPF) and Regional (WCC Core Strategy) level.

**2.2 LANDSCAPE CHARACTER**

Landscape Character Assessment is the process of identifying and describing variation in the character of the landscape. It seeks to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive.

The landscape character of the area has been analysed at a number of scales. Brief outlines are included here to bring out elements and features relevant to the Site and surrounding area.

**2.3 NATIONAL LANDSCAPE CHARACTER ASSESSMENT**

Natural England published an updated profile for the area in 2014. The Site is located in National Character Area Profile 117: Avon Vales. Whilst the National Character Area profiles provide some insight into the landscape around the Study Area, they cover large areas and only provide a broad overview.

In summary, the NCA is described as follows:  
*'The Avon Vales form a low-lying, clay-dominated open landscape, with the higher ground of the Salisbury Plain and West Wiltshire Downs National Character Area (NCA) to the south, Berkshire & Marlborough Downs NCA to the east, and the Cotswolds NCA to the west. In the south and north there is a gradual merging with the clay of the Blackmore Vale and Vale of Wardour NCA and the Upper Thames Clay Vales NCA respectively.'*

The key characteristics identified in the NCA and considered relevant to the Site are summarised below:

- An undulating clay vale with a mix of arable and pasture.
- Small and medium-sized fields with mostly hedgerow boundaries with few hedgerow trees, varying in shape from irregular piecemeal enclosure to rectilinear planned enclosure.
- Numerous low ridges with local views over towns and villages.
- Transport corridors along roads and watercourses, heavily influential on all development in the NCA.

**2.4 WILTSHIRE LANDSCAPE CHARACTER ASSESSMENT (COUNTY LEVEL)**

Of more direct relevance to the Study Area is the Wiltshire Landscape Character Assessment (Land Use Consultants, December 2005). The purpose of this assessment is to document the current status of the Wiltshire landscape, furthering the understanding of the landscape resource available in the area and giving an indication of areas in need of enhancement and of conservation.

The Study Area falls within Landscape Character Type 11: Rolling Clay Lowland. Landscape Types have a distinct and relatively homogenous character with similar physical and cultural attributes, including geology, landform, land cover, and historical evolution. The Landscape Type has been further sub-divided

into component Landscape Character Areas (LCAs). LCAs are described as discrete geographic areas that possess the common characteristics described for the Landscape Type. Each LCA has a distinct and recognizable local identity.

The Site falls within LCA 11C: Trowbridge Rolling Clay Lowland and its key characteristics are described below:

- Key Characteristics**
- Gently rolling lowland based on Clay.
  - Mixed arable and pastoral land use with pasture concentrated around the water courses.
  - Variable field pattern with network of full hedgerows and mature hedgerow trees.
  - Presence of streams marked by lines of willows and crossed by modest bridges.
  - Woodland blocks including some ancient woodland and wet woodland of high ecological value plus scattered mature trees.
  - Small number of meadows of neutral and unimproved grassland.
  - Scattered settlement of towns, small villages and farmsteads, many using vernacular materials of brick, half timber, stone, tiles and thatch.
  - Roads largely minor and rural with a few trunk roads and sections of motorway.
  - Views vary from semi-enclosed by intact hedgerows, riparian vegetation and woodland blocks to more open with views to the rising scarps of the chalk uplands.
  - A largely peaceful, rural landscape.

**Summary of Landscape Character**  
The assessment describes the Landscape Character Area as follows:

*'Trowbridge Rolling Clay Lowland is a gently undulating, largely rural area of mixed arable and pasture land. Medium to large rectangular fields are bounded by thick hedgerows with mature hedgerow trees. Combined with scattered woodland blocks (some ancient) and rich riparian vegetation along the stream lines, the hedgerows make this a semi-enclosed landscape allowing intermittent views to the steep scarps of the Chalk uplands. Settlement is sparse to the east of the area with scattered nucleated and linear villages and farmsteads.'*

*To the west there is more settlement including the southern part of Trowbridge with some large scale industrial buildings and modern housing estates tending to extend along roads south towards North Bradley, Southwick and Westbury. This western section of the area, which also contains the A350 trunk road and a concentration of railway lines, is considerably less rural and tranquil than the east of the area'.*

- Evaluation**  
Positive landscape features of significance:
- Largely rural, tranquil landscape.
  - Strong pattern of hedgerows and mature hedgerow trees.
  - Many streams with rich riparian vegetation.
  - Woodland blocks of high ecological value.
  - Small scattered villages of traditional pattern and vernacular materials.
  - Views to Chalk scarps and Limestone ridge.

# LANDSCAPE & VISUAL SETTING ANALYSIS

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### Forces for change

- Agricultural intensification and introduction of arable rotation threatens the remaining medieval field patterns and traditional pastoral landscape.
- Hedgerow trees are generally mature with few new trees to replace them.
- Elm loss of 1970s.
- Need for sustainable woodland management including traditional maintenance techniques where appropriate to maintain ancient woodlands and particularly areas of coppice and wood pasture.
- Pressure for further expansion of settlement and new development threatening the character of the small villages and scattered farmsteads.
- Pressure to build new roads and upgrade existing roads through additional kerbing and signage to accommodate an increase in traffic volume.

**Landscape Condition:** This is generally judged as **good**. 'These are areas of mixed pastoral and arable farmland with intact hedgerows, some woodlands and hay meadows of high ecological value and villages of vernacular materials. There are a few elements in poorer condition such as hedgerow trees that are over-mature with few replacement young trees'.

**Strength of character:** 'The Rolling Clay Lowland is in places a peaceful rural landscape with intact hedgerows, woodland blocks and small villages and scattered farmsteads of vernacular materials. However, the varied land use of mixed arable and pastoral farming, the coniferous planting which has affected the character of the historic woodlands and the influence of prominent urban edges and transport corridors including noise and light pollution make the strength of character of the type **moderate** overall'.

### Inherent landscape sensitivities:

- Rural tranquillity.
- Hedgerow pattern.
- Isolated remnant hay meadows.
- Woodlands of ecological value.
- Views to the scarp slopes of the adjacent chalk downlands.
- Settlement pattern of nucleated villages with variety of vernacular building materials.

### Broad management objectives considered relevant to the Study Area:

- Retain and manage the dense hedgerow network and nurture new hedgerow trees.
- Enhance woodland, cattle and horse pasture habitats for bats.
- Minimise small scale incremental change such as signage, fencing or improvements to the road network which could change the rural peaceful character of the landscape.
- Ensure that landscape is at the foundation of decisions about the growth of settlements and that landscape is used to provide a strong framework within which changes can happen in a sustainable way.
- Consider strengthening the enclosed character of the landscape and screening views to intrusive urban edges through nurturing existing and planting new woodland.
- Consider developing guidance for built development to ensure both future construction and changes to existing buildings are designed to integrate with the existing character and structure of settlements.

## 2.5 WEST WILTSHIRE DISTRICT LANDSCAPE CHARACTER ASSESSMENT (REGIONAL LEVEL)

The West Wiltshire Landscape Character Assessment 2007 (Chris Blandford Associates) was produced on behalf of the old West Wiltshire District Council and provides a further level of detailed assessment at 1:25,000 scale.

The Study Area is situated within the North Bradley Rolling Clay Lowland Landscape Character Area E3. The area is situated between the towns of Trowbridge and Westbury, and extends to the western boundary of the district. It is bounded in the North by the A361 and the southern edge of Trowbridge.

### Key characteristics of the LCA are as follows:

- Gently rolling farmland based on clay, with extensive views, including views on the chalk downland in the east and south;
- Distinct pattern of small to medium sized fields enclosed by mainly intact hedgerows with mature trees;
- Predominantly pasture with a few scattered ancient woodland blocks;
- Settlements consist of several villages and farmsteads linked by a dense network of mainly secondary roads and footpaths;
- Pylons as a dominant vertical element.

The location the North Bradley Rolling Clay Lowland Landscape Character Area E3 is shown in Fig 2.

### Evaluation

This section highlights that hedgerow field boundaries are generally in good condition and most of the traditional field pattern remains intact. The landscape is described as having inherent landscape sensitivities which include the scale and landscape setting of Southwick and North Bradley, the remaining traditional field pattern and the open views.

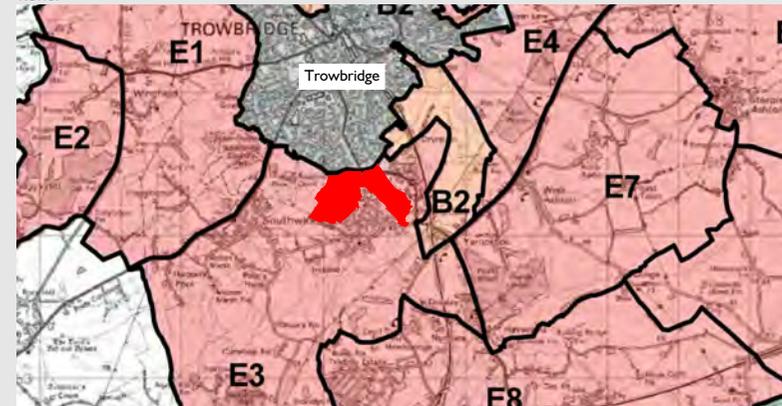


FIG.2 LOCATION OF NORTH BRADLEY ROLLING CLAY LOWLAND LANDSCAPE CHARACTER AREA E3 WITH THE STUDY AREA IDENTIFIED IN RED FOR CONTEXT.

# LANDSCAPE & VISUAL SETTING ANALYSIS

## PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE



### 2.5 CHARACTER OF THE STUDY AREA

It is considered that the Study Area is typical of the North Bradley Rolling Clay Lowland character area description above.

The key characteristics specific to the Study Area are summarised below:

- Gently undulating lowland landscape.
- Mainly pastoral land use with some 'horsiculture'.
- Variable and traditional field pattern of small-medium size with network of full hedgerows and mature hedgerow trees.
- Views vary from semi-enclosed by intact hedgerows to more open with views to the rising scarps of the chalk uplands to the south / south-east.
- A largely peaceful, rural landscape away from Woodmarsh.
- Woodmarsh is a busy inter-urban road (located between two roundabout junctions associated with the A363) and has an influence on the Study Area.

The Study Area is a rural and enclosed landscape with mature hedgerows including numerous trees create an intimate landscape in places. It has a distinct pattern of small to medium sized fields enclosed by mainly intact hedgerows with mature trees. This character extends westwards towards Southwick although topography becomes a more noticeable feature to the west with land rising up to a gentle ridge to the north of Southwick. It's important to note that the landscape of the Study Area is assessed within the wider context of the broader landscape area between Southwick and Trowbridge.

Away from the busy Woodmarsh and the A363, the landscape to the north-west of the village is largely peaceful and has a rural character.

Views are often restricted by intervening vegetation and in some places by the nature of the gently rolling topography.

Axe & Cleaver Lane (Bridleway) forms a strong 'Green Edge' to the north and west of the village with mature hedgerows on both sides and numerous mature trees. It forms an attractive rural lane along most of its length except the section between Bramble Farm & Woodmarsh which has recently be improved with a coarse stone surfacing to improve access to Bramble Farm. The lane is also well connected to the network of public footpaths that connect with North Bradley, Southwick to the west and Trowbridge to the north.

At the time of the visit the footpath network was being well used by dog walkers throughout the broader landscape area, including the landscape area between Southwick and Trowbridge.

Generally, intervisibility between North Bradley village and Trowbridge is restricted. It is limited to the narrow section of landscape between Axe & Cleaver Lane to the north of the village and the southern edge of Trowbridge. At this point, the physical separation is as little as 150m. Similarly, the gap is also squeezed to the east of Woodmarsh. Here, the landscape gap is at its weakest; bisected by the urban character of Woodmarsh and its junction with the busy A363 further to the north. In addition, part of this narrow strip of landscape to the west of Woodmarsh is currently being used by Trowbridge FC and is formally managed. However, mature hedges along the football pitch boundary and both sides of Woodmarsh restrict views towards Trowbridge; limiting views at this point to glimpses though the football club access.

Recent development (Hitachi Capital Vehicle Solutions) has taken place to the west of the A363 at the junction with Westbury Rd (opposite the White Horse Business Park) and is encroaching on the landscape gap here. However, mature hedgerows along Little Common Lane help to restrict views to the east. It should be noted that the scale of this development in combination with existing residential development along Westbury Rd and the urban character of the roads and junction is weakening a sense of separation here.

In the wider landscape, a number of buildings can be seen such as Bramble Farm and Park farm. There are also occasional long distance views of chalk hills to the south-east are possible including the Westbury White Horse.

In summary, the Wiltshire Landscape Character Assessment assesses the strength of character of this landscape to be **moderate** and in a **good** condition. It is considered that the Study Area is largely consistent



View along Axe & Cleaver Lane (Bridleway). It forms a strong 'Green Edge' to the north and west of the village with mature hedgerows on both sides and numerous mature trees

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2.6 LANDSCAPE CHARACTER CONTEXT

The following photographs provide representative views of the landscape character of the area around the Site.



View looking north across Trowbridge FC ground with the edge of Trowbridge visible.



View along Axe & Cleaver Lane showing the rural character evident within most parts of the landscape area between North Bradley and Trowbridge.



View of landscape looking north with the 'Green Edge' of Axe & Cleaver Lane in the background showing numerous mature trees and the enclosed character of much of the area restricting views.



Another view along Axe & Cleaver Lane with mature and intact hedgerows with mature trees.



View from Axe & Cleaver looking north from Bramble Farm. At this point, the landscape gap is very narrow and at its weakest and requires enhancement to reinforce and preserve the sense of separation between North Bradley and Trowbridge.



View looking north-east from public right of way towards Little Common Farm (east of Westbury Rd) with memorial gates and small orchard. The mature trees beyond the farm (adjoining the White Horse Business Park) create an important and significant backdrop to the landscape here.

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### 2.7 PLANNING CONTEXT

#### NATIONAL PLANNING CONTEXT – THE NATIONAL PLANNING POLICY FRAMEWORK

National planning policy contains guidance on planning and related issues from a national perspective. From the 27th March 2012, this has primarily been set out within the National Planning Policy Framework (NPPF) document.

The NPPF is a wide-ranging document which sets out a presumption in favour of sustainable development (paragraphs 11 to 16) and core planning principles (paragraph 17) before detailing (in paragraphs 18 to 219) policies which, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.

These policies are broken down into 3 main parts under the headings:

- Delivering Sustainable Development (which itself is divided into 13 sub-sections).
- Plan making
- Decision taking

Of particular relevance to the Study Area are policies in the following sections of the first part of this document:

- NPPF Section 7 - Requiring good design
- NPPF Section 11 - Conserving and enhancing the natural environment
- NPPF Section 12 - Conserving and enhancing the historic environment

Section 7, Paragraph 58 states that local and neighbourhood plans should develop robust policies which set out the quality of any new development which will be expected based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions among others should aim to ensure development:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation; and
- Are visually attractive as a result of good architecture and appropriate landscaping.

Section 11, Paragraph 109 of the document states that the planning system should contribute to the protection and enhancement of the natural and local environment through, among others protecting and enhancing valued landscapes.

#### WCC CORE STRATEGY

The Wiltshire Core Strategy was adopted by Wiltshire Council in January 2015 and sets out the planning policy within the district up to 2026. A number of policies from the West Wiltshire District Plan 2004 and West Wiltshire Leisure and Recreation DPD 2009 have also been saved within the Core Strategy and remain relevant in so far as they accord with the NPPF. The main landscape policies from these documents relevant to the Study Area are as follows:

- Policy CP51 requires any new development to preserve, conserve and where possible enhance landscape character, mitigating any negative effects through sensitive design and landscape measures. Proposals should be informed by the relevant landscape character assessments.
- Policy CP52 requires development to retain and enhance Wiltshire’s green infrastructure network, linking to the network, providing accessible open space in accordance with Wiltshire Open Space Standards and ensuring appropriate long-term management.
- Policy CP57 requires development to be of a high standard of design, in particular retaining and enhancing existing important landscaping, responding to and retaining important views into and out of the site and ensuring public realm

proposals create places of character.

- Saved Policy C40 requires trees of visual amenity value to be retained, especially those in Conservation Areas and those covered by Tree Preservation Orders.
- Saved Policy CR1 seeks to protect the public rights of way network from development and seek extensions and improvements where appropriate, as part of development proposals.
- Saved Policy CR3 seeks to develop a greenspace network around the urban areas within the district, encouraging development proposals to provide recreational areas and extend and enhance fragmented habitats.

#### The strategy for the Trowbridge Area

Under the ‘Issues and Considerations’ section, Paragraph 5.150 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’.*



View of traditional caravan and agricultural equipment on display at Little Common Farm.

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### 3.0 LANDSCAPE ANALYSIS SUMMARY WITHIN THE STUDY AREA (FIGS.3 & 4)

It is considered that the 'Key elements' that contribute to landscape character in the Study area are as follows:

#### PHYSICAL INFLUENCES

Soils: The soils are clay-based and is likely to be a factor behind the number of characterful oak trees in the Study Area.

Vegetation: Mature and intact hedgerows with specimen trees and pasture.

#### Habitats:

- There is no SPA / SAC / LNR within the Study Area.
- The nearest SSSI / SAC is at Picket and Clanger Wood to the south-east at Yarnbrook.
- There are no areas of Ancient Woodland within the Study Area.

Tree Preservation Orders: There are only a handful of TPO trees which are in the grounds of two residential properties east of Woodmarsh (Nos.16 & 18)

Landform / topography: The Study Area is very gently undulating between 45-50m AOD. To the west, beyond the Study Area, the land falls gently to c.40m AOD towards Southwick Court Farm before rising up again to c. 50m AOD at Southwick. Beyond the Study Area to the east, the elevated landscape of Salisbury Plain can be seen.

Drainage / water bodies: There is a small stream to the west of the Study Area that runs in a roughly north westerly direction towards Southwick Court Farm (Lambrook Stream) with streamside vegetation including some willow.

#### INFLUENCES OF HUMAN ACTIVITY

Heritage assets: There are no Sites of Archaeological Importance / Conservation Areas / Scheduled Ancient Monuments / Registered Parks and Gardens or undesignated heritage assets.

There are Listed buildings within the Study Area (refer to Figure 4) as follows:

- Willow Grove (Grade II) near Little Common Farm to the east of the Study Area
- Two monuments and a gateway in the burial ground of a former Baptist Chapel (Grade II) to the east of the Study Area

Land use / management: Primarily pastoral with recreational and leisure function.

Landscape pattern: Small to medium scale fields separated by established hedgerows with trees although there is some weakness north of Bramble farm where hedgerows have been lost.

Settlement pattern & character of settlement: North Bradley is a large, clustered village that is separate from Trowbridge. The White Horse Business Park to the east forms a separate cluster of a larger scale and commercial nature.

Character of buildings / built form: North Bradley contains largely 2 storey detached and semi-detached properties and bungalows. A large number of these are twentieth century era however there are numerous brick and stone-built properties from the Victorian period and earlier seen most notably along Woodmarsh. The northern edge of the village west of Woodmarsh is characterised by planned residential estate development undertaken over a number of phases during the late twentieth century.

This character is reflected in the southern edge of Trowbridge to the west of the A363. To the east, Trowbridge Retail Park introduces large-scale, commercial buildings (sheds) with significant access and parking infrastructure.

There are a number of farms within the Study Area with an associated cluster of outbuildings. Little Common Farm to the east of Woodmarsh and Park Farm to the west include traditional brick built farmhouses. With the exception of Bramble Farm, which is of more modern construction, these farms provide visual interest and include mature trees and vegetation in close proximity.

Access / movement: There are numerous public rights of way (PROW) within the Study Area and these are shown in Figure 3.

Cultural elements: No references are known.

Community spaces: Trowbridge FC grounds are used informally when not in use by the football club. There is a significant open space area in North Bradley at the Peace Memorial Hall, south of Southwick Rd.

#### AESTHETIC AND PERCEPTUAL FACTORS

Scale: The scale of the landscape created by field sizes / mature hedgerows and trees varies across the Study Area from small-medium scale. Mature trees / hedgerows often form a backdrop restricting views and creating a well contained landscape. The scale of village development is generally small and largely residential.

Larger scale, commercial development associated with White Horse Business Park and Trowbridge Retail Park are largely hidden from view within the Study Area and have little influence in terms of scale.

Complexity: The Study Area is quite a well-defined rural / rural-fringe area with mature hedgerows and specimen trees that largely restrict views of adjoining urban elements and transport corridors. The Study Area is of moderate complexity, consisting of transport infrastructure elements; urban elements (largely residential) and rural elements (including farm buildings, small to medium sized pasture fields, woodlands and hedgerows).

Degree of enclosure / openness: Quite enclosed to the east and west of Woodmarsh and along Axe and Cleaver lane although the area to the north and south of Bramble Farm is more open.

Tranquility: More tranquil to the south-west and east towards Little Common Farm way from Woodmarsh. Traffic noise associated with the A363 and Woodmarsh is apparent to the north of the Study Area.

Wildness & remoteness: It is not a wild or remote landscape but one that is a product of centuries of intervention by man. It is located close to urban areas.

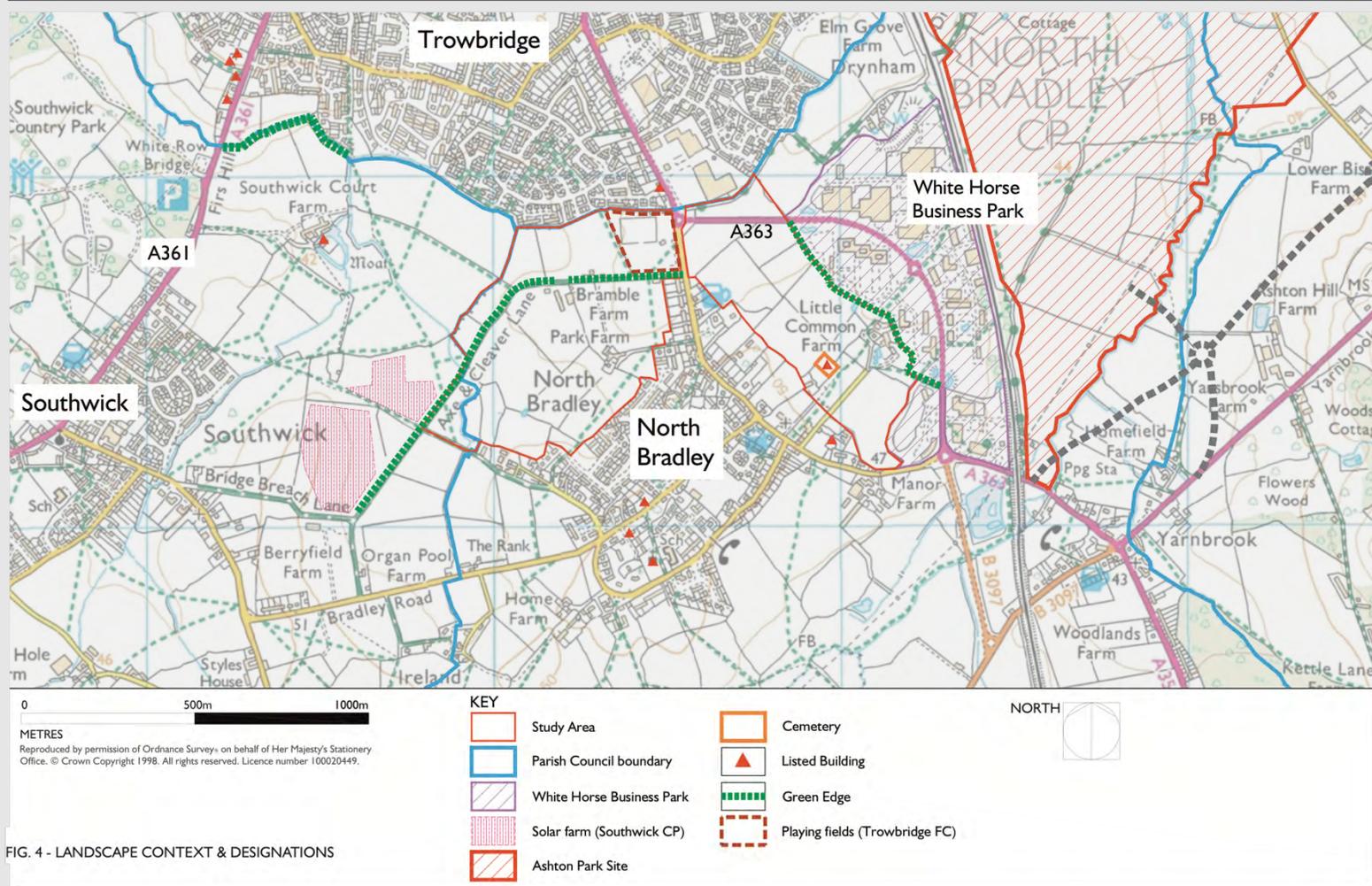
Sense of place: It is a fairly ordinary rural landscape with no specific sense of place such as that created by Oast houses in Kent etc. However, it does have some redeeming qualities described in Section 2.5 and illustrated in Section 4. There are some distant views towards Salisbury Plain and the Westbury White Horse.

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FIG.3 PUBLIC RIGHTS OF WAY NETWORK WITHIN THE STUDY AREA

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# LANDSCAPE & VISUAL SETTING ANALYSIS

## PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE



### 4.0 VISUAL ANALYSIS

Representative views are taken from publicly accessible areas surrounding the Site. Some views have been included for the purposes of context. The location of viewpoints are shown on Fig. 5.

The pattern of small to medium sized fields with hedgerows and trees often create an enclosed landscape so that intervisibility between the built edge of Trowbridge and North Bradley is largely restricted and limited to those views possible from along Axe & Cleaver Lane where the physical separation between the two settlements is at its narrowest.

Overall, the landscape within the Study Area is in places quite a complex landscape dominated by mature, intact hedgerows and mature trees that help to create the impression of a well vegetated landscape. In combination, this creates an effective 'cloak' of visual separation; helping to preserve a sense of identity and landscape setting for the village over relatively short distances.

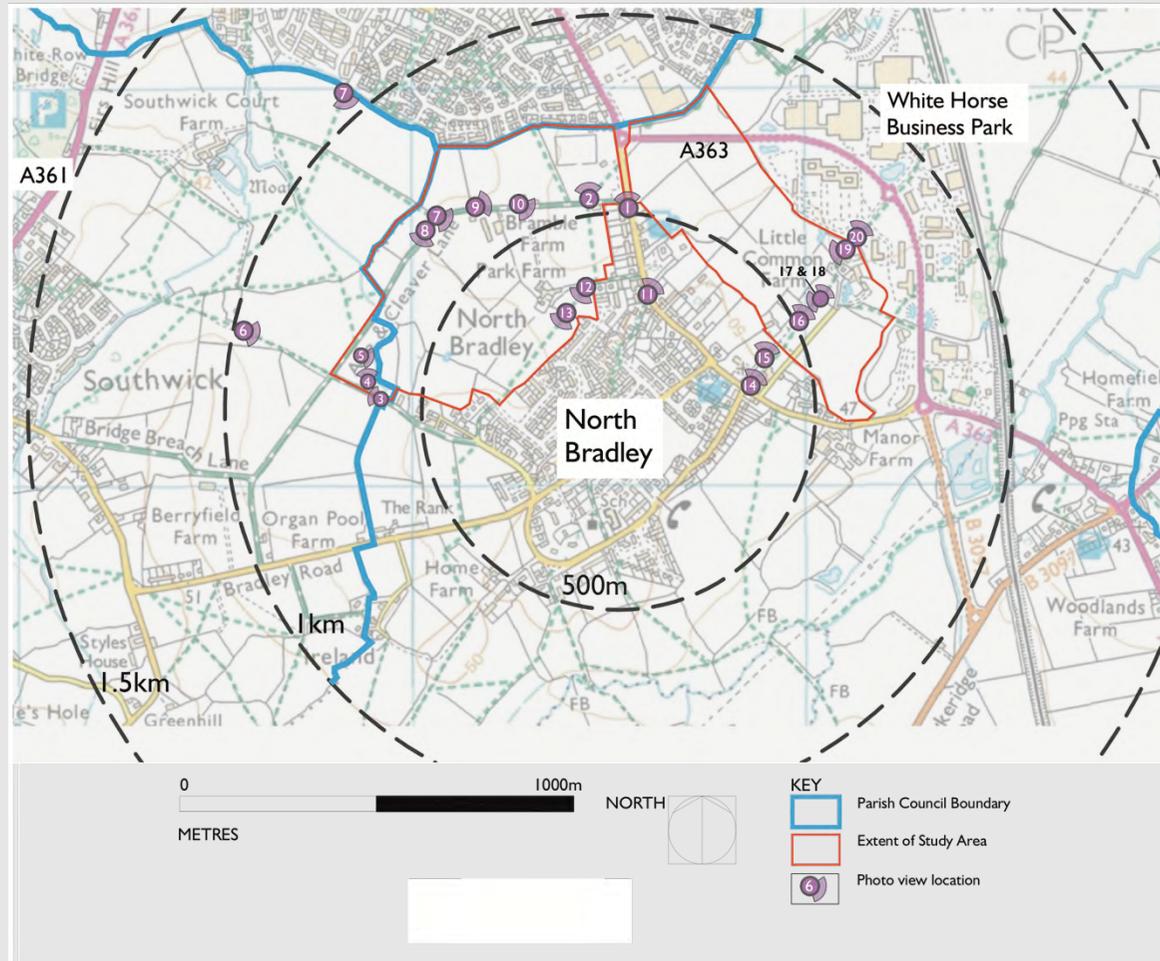


FIG. 5 - VIEWPOINT LOCATIONS

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



**4.1 PHOTO VIEWPOINTS**



Photograph 01  
 View looking north along Woodmarsh from Axe & Cleaver Lane (Public Bridleway NBRA3)

**VIEWPOINT COMMENTARY**

View looking north along Woodmarsh from Axe & Cleaver Lane. The view shows the entrance to Trowbridge FC football ground which is fenced off with steel palisade fencing and largely contained by a mature and intact hedgerow.

At this point the landscape gap is at its narrowest at c. 150m and weakest in terms of character. Glimpses of the southern edge of Trowbridge are possible through gaps in the hedge.



Photograph 02  
 View from within Trowbridge FC football ground looking north

**VIEWPOINT COMMENTARY**

View from within Trowbridge FC football ground looking north with the built edge of Trowbridge in the background.

The character of this part of the gap is managed or amenity landscape and clearly not countryside, however, it is judged as strategically important in order to prevent coalescence here. There is potential to enhance this part of the gap in landscape terms in the future should the opportunity arise for the football club to be relocated.

**4.1 PHOTO VIEWPOINTS (CONT)**



Photograph 03  
 View looking north-west along Public Bridleway NBRA28 from the edge of North Bradley

**VIEWPOINT COMMENTARY**

View looking north-west along Public Bridleway NBRA28 from the edge of North Bradley at the western edge of the Study Area. The view is fairly typical of this part of the Study Area with mature and intact hedgerows with numerous tree specimens creating an enclosed and intimate landscape.

The character here is rural and tranquil.



Photograph 04  
 View looking north-west along Public Footpath SWCK1 at the western edge of the Study Area

**VIEWPOINT COMMENTARY**

View looking north-west along Public Footpath SWCK1 at the western edge of the Study Area. The view is fairly typical of this part of the Study Area with mature and intact hedgerows with numerous tree specimens creating an enclosed and intimate landscape.

The character here is rural and tranquil. The 'Green Edge' created by Axe & Cleaver Lane can be seen in the background; effectively restricting intervisibility between North Bradley and Trowbridge. Willows along the edge of the stream (Lambrok Stream) add a riparian character.

**4.1 PHOTO VIEWPOINTS (CONT)**



Photograph 05  
 View looking towards the Site from the existing driveway at the junction with the Bridleway

**VIEWPOINT COMMENTARY**

View looking east from Public Footpath SWCK1 at the western edge of the Study Area. The view shows limited visibility of North Bradley with only a large property at the western end of The Rank clearly visible and glimpsed views of the edge of North Bradley beyond.

Overall, the landscape character is enclosed and intimate.



Photograph 06  
 Broader view from Public Footpath SWCK5A taken from beyond the Study Area looking east towards North Bradley

**VIEWPOINT COMMENTARY**

Broader view from Public Footpath SWCK5A taken from beyond the Study Area looking east towards North Bradley. The 'Green Edge' of Axe & Cleaver Lane restricts any visibility of North Bradley.

The view shows the recently constructed solar farm which is low impact visually and largely contained by the surrounding network of mature hedges and therefore has little influence on the character of the Study Area.

Long distance views of Salisbury Plain including the Westbury White Horse can be seen.

**4.1 PHOTO VIEWPOINTS (CONT)**



Photograph 07  
 View looking north from Furzey Down Farm along the driveway

**VIEWPOINT COMMENTARY**

View looking south-east from Axe & Cleaver Lane towards North Bradley. The traditional pattern of small to medium sized fields give way to a larger more open landscape here.

The area immediately around Bramble Farm has an untidy appearance with numerous pieces of agricultural equipment visible. Park farm and associated buildings is visible along with the northern edge of North Bradley which can be seen nestled within a mature landscape.

Long distance views of Salisbury Plain including the Westbury White Horse can be seen.



Photograph 08  
 View looking south along Axe & Cleaver Lane

**VIEWPOINT COMMENTARY**

View looking south along Axe & Cleaver Lane. It forms a strong 'Green Edge' to the north and west of the village with mature hedgerows on both sides and numerous mature trees.

For the majority of its length it creates a rural lane character.

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



**4.1 PHOTO VIEWPOINTS (CONT)**



Photograph 09  
 View looking east along Axe & Cleaver Lane from Bramble Farm

**VIEWPOINT COMMENTARY**

View looking east along Axe & Cleaver Lane from Bramble Farm. The area immediately around Bramble Farm has an untidy appearance with numerous pieces of agricultural equipment visible. The traditional field pattern with hedgerows is at its weakest here. The southern edge of Trowbridge is visible.

Axe & Cleaver Lane has recently been surfaced with coarse stone giving rise to a more urban character at this point.

The mature hedgerows along the lane prevent intervisibility between North Bradley and Trowbridge.



Photograph 10  
 View looking south-east from along Axe & Cleaver Lane from near Bramble Farm towards Park Farm and North Bradley

**VIEWPOINT COMMENTARY**

View looking south-east from along Axe & Cleaver Lane from near Bramble Farm towards Park Farm and North Bradley.

Residential properties along Woodmarsh can be seen.

Traffic noise along Woodmarsh evident.

On the whole, and despite its close proximity to North Bradley, the landscape here has a rural character.

**4.1 PHOTO VIEWPOINTS (CONT)**



Photograph 11  
 View from Woodmarsh looking north-east

**VIEWPOINT COMMENTARY**

View from Woodmarsh looking north-east. There is a rural edge character here with a number of detached and semi-detached properties set well back from the road with large gardens including numerous mature trees and vegetation.

There are glimpsed views of the wider landscape beyond to the east.



Photograph 12  
 View from Public Footpath NBRA1 looking south to south-west towards North Bradley

**VIEWPOINT COMMENTARY**

View from Public Footpath NBRA1 looking south to south-west towards North Bradley.

Small paddock fields enclosed by hedgerow vegetation restrict extensive views of North Bradley even at relatively close range.

**4.1 PHOTO VIEWPOINTS (CONT)**



Photograph 13  
View from Public Footpath NBRA1 looking south to south-west towards North Bradley

**VIEWPOINT COMMENTARY**

View from Public Footpath NBRA1 looking south to south-west towards North Bradley.

More extensive views of residential properties along the northern edge of the village are possible. However, even at this close range (less than 50m distance) the edge of settlement is generally seen within a well-established landscape setting.

The small paddock fields with hedgerows and horse grazing reinforce a rural edge character.



Photograph 14  
View along Public Footpath NBRA7 from Westbury Rd

**VIEWPOINT COMMENTARY**

View along Public Footpath NBRA7 from Westbury Rd with the North Badley Baptist church on the left (north side).

A mature hedge to the south of the path restricts views beyond to the south.

**4.1 PHOTO VIEWPOINTS (CONT)**



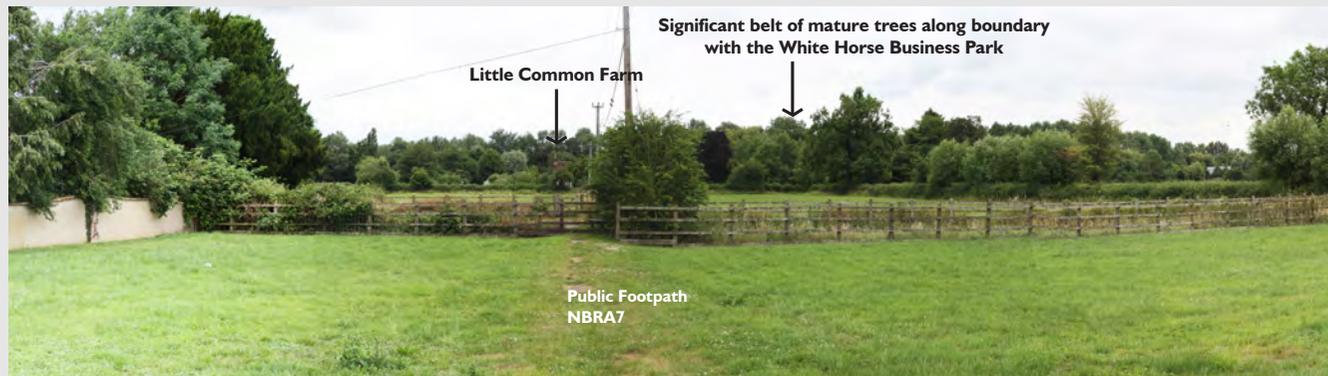
Photograph 15  
 View along Public Footpath NBRA7 looking north from rear of Baptist Church grounds

**VIEWPOINT COMMENTARY**

View along Public Footpath NBRA7 looking north from rear of Baptist Church grounds.

The landscape here has a rural character with small to medium-sized fields with mature intact hedgerows with trees, and mature vegetation associated with farm buildings.

There is no intervisibility between North Bradley and the White Horse Business Park to the north-east.



Photograph 16  
 View along Public Footpath NBRA7 looking north-east towards Little Common Farm

**VIEWPOINT COMMENTARY**

View along Public Footpath NBRA7 looking north-east towards Little Common Farm.

A significant belt of mature trees along the White Horse Business Park creates a strong 'Green Edge' to the Study Area.

There is no intervisibility between North Bradley and the White Horse Business Park.

**4.1 PHOTO VIEWPOINTS (CONT)**



Photograph 17  
 View looking west to north-west from Public Footpath NBRA7

**VIEWPOINT COMMENTARY**

View looking west to north-west from Public Footpath NBRA7.

Views of North Bradley are restricted by intervening vegetation. No views of Trowbridge are possible.

The landscape here has a rural character that is quite tranquil although a distant sound of traffic from the A363 is possible. Groups of mature trees (some of which are TPO) add a richness and complexity to the scene.



Photograph 16  
 View looking north-east from Public Footpath NBRA7 towards Little Common Farm

**VIEWPOINT COMMENTARY**

View looking north-east from Public Footpath NBRA7 towards Little Common Farm.

The landscape here is well vegetated and complex with hedgerows, mature trees and a small orchard.

At this relatively close distance, there is still no perception of the White Horse Business Park.

The gates on this section of the footpath have memorial plaques. There is a small display of a traditional caravan and agricultural equipment adjacent to the path near to the farmhouse providing additional visual interest.

**4.1 PHOTO VIEWPOINTS (CONT)**



Photograph 19  
View of the western edge of White Horse Business Park from Public Footpath NBRA7

**VIEWPOINT COMMENTARY**

View looking west across the Study Area from its eastern boundary looking back towards North Bradley.

Some properties are visible along Woodmarsh but overall it is a landscape that has a rural character with few visual intrusions.

Trowbridge is not visible at this point and there is little perception of the adjoining business park area to the east.



Photograph 20  
View of the western edge of White Horse Business Park from Public Footpath NBRA7

**VIEWPOINT COMMENTARY**

View of the western edge of White Horse Business Park from Public Footpath NBRA7.

This view is taken just beyond the line of the significant belt of trees that form an effective 'Green Edge' along the eastern edge of the Study Area and provides a notable contrast in character between the two areas.

# LANDSCAPE & VISUAL SETTING ANALYSIS

## PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE



### 5.0 LANDSCAPE GAP RECOMMENDATIONS (FIG. 6)

The report makes recommendations for defining the extent of a North Bradley Landscape Gap that is based on the complex interaction between both the visual and landscape character analysis carried out.

In some places, this is driven more by the visual influence such as the narrow section to the north of Axe & Cleaver Lane and in other areas by the nature of the landscape itself eg the strong rural character in the vicinity of Axe & Cleaver Lane to the west.

The landscape performs many complex functions, of which providing a 'gap' between settlements, to prevent their coalescence and maintaining the identity and setting of individual settlements is an important one.

The Landscape Gap is also multi-functional and works on a number of levels including providing land for agriculture, green infrastructure, access, visual amenity and recreation. These principles underpin the recommendations made in this report.

The extent of the proposed North Bradley Landscape Gap is shown on Figure 6. The plan also makes some recommendations for landscape enhancement measures for consideration. It is considered that in landscape and visual terms, the Landscape Gap does have the capacity to accommodate some small-scale, low-density development that is carefully sited whilst maintaining the integrity of the Gap. These potential sites are shown on Figure 6.

The rationale for the recommended extent of the North Bradley Landscape Gap is summarised below.

#### Area West of Woodmarsh

To the west of Woodmarsh, the landscape falls into two areas; the narrow strip between Axe & Cleaver Lane and Trowbridge that includes the Trowbridge FC ground and Bramble Farm and the more rural landscape to the west and south-west. The former is considered essential to retain simply by virtue of its proximity to Trowbridge although it has limited intrinsic landscape value. The latter area, further west of the football ground, is essential to retain both for its separation and landscape setting function and to protect the rural character of this landscape.

Within this area there is some potential to accommodate new low-density development (max. 2 storey) along the north-western edge of North Bradley if done sensitively. This area is well contained by mature hedgerows and any new development would reinforce this existing buffer with new native structure planting.

The western edge of the Landscape Gap forms a natural boundary with the Southwick Parish Council boundary; creating an obvious extension to the Landscape Gap and helping to maintain separation between the two villages as well as Trowbridge.

The land between Axe & Cleaver Lane and Trowbridge is seen as strategically important given that this area of the Landscape Gap is at its narrowest but still maintains separation between Trowbridge and North Bradley. There is potential to enhance the area of land currently being used by Trowbridge FC should the football club be relocated. This area of land could be managed in such a way as to change the character from amenity landscape to countryside. The public right of way across the land linking North Bradley with Trowbridge could also be reinstated.

#### Area East of Woodmarsh

To the east of Woodmarsh and North Bradley, the area between the village and the significant belt of vegetation located to the west of the White Horse Business Park should be retained as open land to protect the setting of the village. It is essential to retain both for its separation and landscape setting function and to protect the rural character of this landscape.

The area of land to the north of the A363 is separated by the road and is considered to be somewhat remote from village so has not been proposed as part of the Landscape Gap.

#### Wiltshire County Council DPD allocations (Draft June 2107) Commentary

This document identifies development sites that have implications for the North Bradley Landscape Gap recommendations. These are summarised below with site references from the DPD:

##### Site Ref: H2.2 Land off the A363 at White Horse Business Park

Development on land to the east of North Bradley between the village and the White Horse Business Park for up to 150 dwellings. This site is located within the proposed Landscape Gap. Such proposals would clearly have implications for the Landscape Gap and weaken further any sense of separation between the village and Trowbridge. Development on such a scale here would undermine the integrity of the Landscape Gap and impact on the setting of the village.

The DPD identifies that the site fronts a 'gateway' route to the town and that an objective of detailed design and layout will be 'to retain visual separation of the Town's urban area from North Bradley village. To achieve this, development proposals would need to be focussed within the north-east of the site, screened with new planting and provide improvements to walking and cycling routes through to the town'.

Subject to detailed analysis, there may be opportunities for high quality and small-scale development within existing large plots to the east of Woodmarsh as indicated on Figure 6; ensuring that existing mature trees and vegetation are retained and maintaining the extent of the edge of settlement. There may also be opportunities subject to detailed analysis for development south-east of Little Common Lane. This area is visually separated from the proposed Landscape Gap and could be designed to incorporate significant structure planting to reinforce this visual edge. Such measures would provide additional screening benefits between the Landscape Gap and any proposed development to the south-east.

##### Site Ref: H2.1 Elm Grove Farm

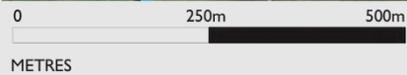
Development on land to the north of the A363 is also identified for residential development of up to 200 dwellings on the Elm Grove Farm site to the north of the A363, between the White Horse Business Park and the edge of Trowbridge. This site is outside the proposed Landscape Gap.

Subject to further detailed analysis, it is considered that this more remote site from the Landscape Gap could be supported provided that the 'wedge shaped' area of land at the south-western end of this site is allocated for green infrastructure including significant structure planting. Such measures would provide additional screening benefits between the Landscape Gap and any proposed development.

##### Site Ref: H2.6 Southwick Court

Development of land at Southwick Court for approximately 180 dwellings. The site extends over a significant area of agricultural land to the south of Trowbridge, and would include land within the proposed Landscape Gap; extending as far south as Axe & Cleaver Lane. The scale of such development would have clear implications for this part of the Landscape Gap and the sense of separation not only for North Bradley but for Southwick also. Such development here could significantly weaken the integrity of the Landscape Gap between Axe & Cleaver Lane and Trowbridge.

**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



**6.0 SUMMARY AND CONCLUSIONS**

In **visual** terms, and beyond the section of narrow landscape either side of Woodmarsh as highlighted previously, there is currently a feeling of separation between North Bradley and Trowbridge. There is no significant intervisibility between the two settlements despite the relatively short distance between them.

In **landscape** terms, the character of the landscape is consistent with that included within the West Wiltshire Landscape Character Assessment with the exception of some parts of the Study Area which have been identified. Overall, the strength of character is judged to be **moderate** but is vulnerable to the urbanising influence of Trowbridge, new development and transport routes. The condition of the landscape is judged to be **good**.

**Figure 6 shows the recommendations for the extent of the North Bradley Landscape Gap based on the analysis findings to ensure that the landscape setting for North Bradley is retained; thus, maintaining separation and helping to preserve the sense of identity for the village.**

The recommendations also include some possible landscape enhancement measures either as part of a wider landscape strategy for the Landscape Gap or delivered as part of any future development (outside the Landscape Gap boundary). The nature of these measures is outlined in Section 5.0 and could offer significant benefits for visual amenity and biodiversity; with the potential to provide a meaningful legacy for the North Bradley Landscape Gap.

It should be noted that the recommendations do not exclude development taking place within the Landscape Gap. However, by identifying what is considered to be a 'meaningful' gap and in places a 'necessary' gap to prevent coalescence, it can be used through the Neighbourhood Planning Process to guide local priorities, planning policies, landscape enhancement strategies and, where appropriate in terms of scale and location, help to identify suitable sites for new development.

# LANDSCAPE & VISUAL SETTING ANALYSIS

## PROPOSED LANDSCAPE GAP, NORTH BRADLEY, TROWBRIDGE



### 10 REFERENCES

#### **Map References**

1:25,000 Ordnance Survey map.

#### **General Document References**

Landscape Institute & Institute of Environmental Management and Assessment; (2013); Guidelines for Landscape and Visual Impact Assessment, Third Edition.

Landscape Institute; Landscape Advice Note 01/11, Photography and Photomontage in Landscape and Visual Impact Assessment.

#### **Core Planning Documents**

National Planning Policy Framework (NPPF). Department for Communities and Local Government: March 2012.

Wiltshire Core Strategy (January 2015).

West Wiltshire District Plan (2004).

#### **Supplementary Planning Guidance / Reference Documents**

West Wiltshire Leisure and Recreation DPD (2009).

Wiltshire County Council DPD allocations (Draft June 2107).

#### **Landscape Character Assessments & Associated Documents**

National Character Area Profile 117: Avon Vales (Natural England).

Wiltshire Landscape Character Assessment (Land Use Consultants, December 2005).

#### **Website references**

Multi-Agency Geographic Information for the Countryside (MAGIC). Web link - <http://magic.defra.gov.uk/>

Historic England Map Search.

### Appendix 3: Draft Policy 1 North Bradley Landscape Setting and Housing Site at Elm Grove Farm

Context	References
North Bradley Plan Objectives	1
Wiltshire Core Strategy	CP 1, 2, CP 29 (see especially paragraph 5.150), CP 50, 51.
NPPF	73,74,75,109,184,185

7.8 Paragraph 5.150 of the Wiltshire Core Strategy states:

*‘It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and 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.’*

7.9 The Wiltshire Open Space Study (2015) advocates the preservation of existing Open Space. Strategic Option 1 states:

*‘...It is therefore recommended that priority is placed on protecting those open spaces where there is an existing shortfall of supply as highlighted in the area profiles.’*

Regarding the role of neighbourhood plans, the Study notes:

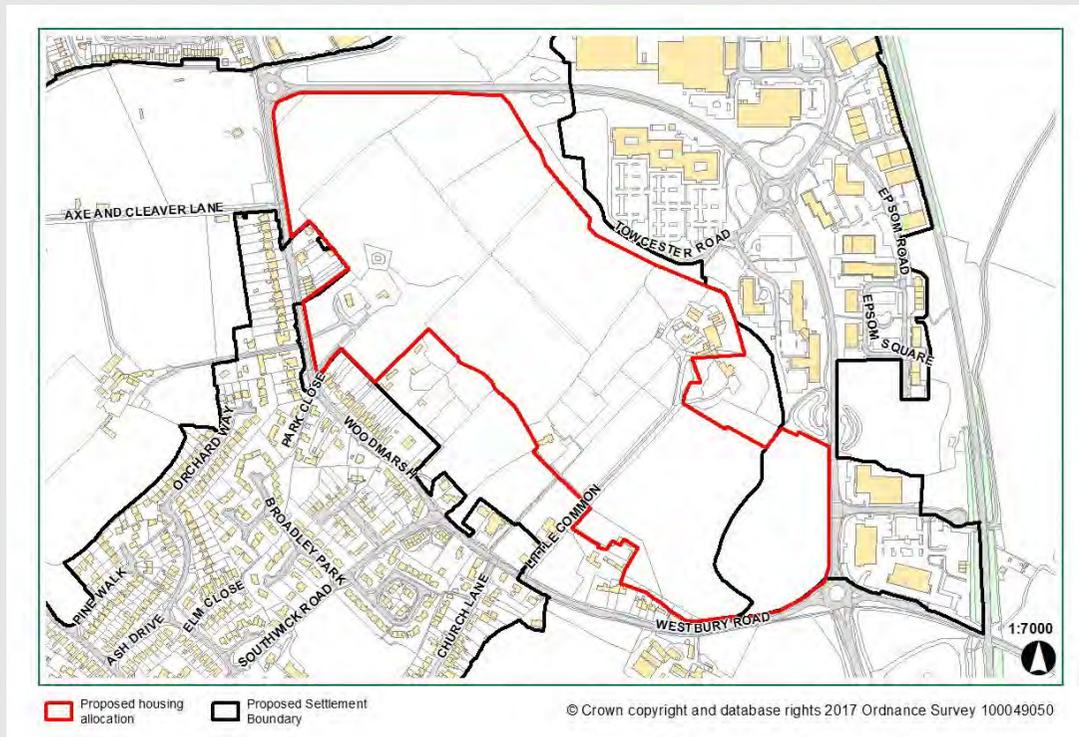
*‘One of the emerging priorities from localism is for there to be much more local decision making with regards to planning, and for local communities to develop neighbourhood plans. Although it is up to local communities to define their own priorities within neighbourhood plans, the information provided within the area profiles in this study will form a good basis to inform any decisions related to the provision of open space’.*

The area profile for Trowbridge Rural Areas Table (Table 17) shows that there is a shortfall of open space in the area - See Appendix 7.



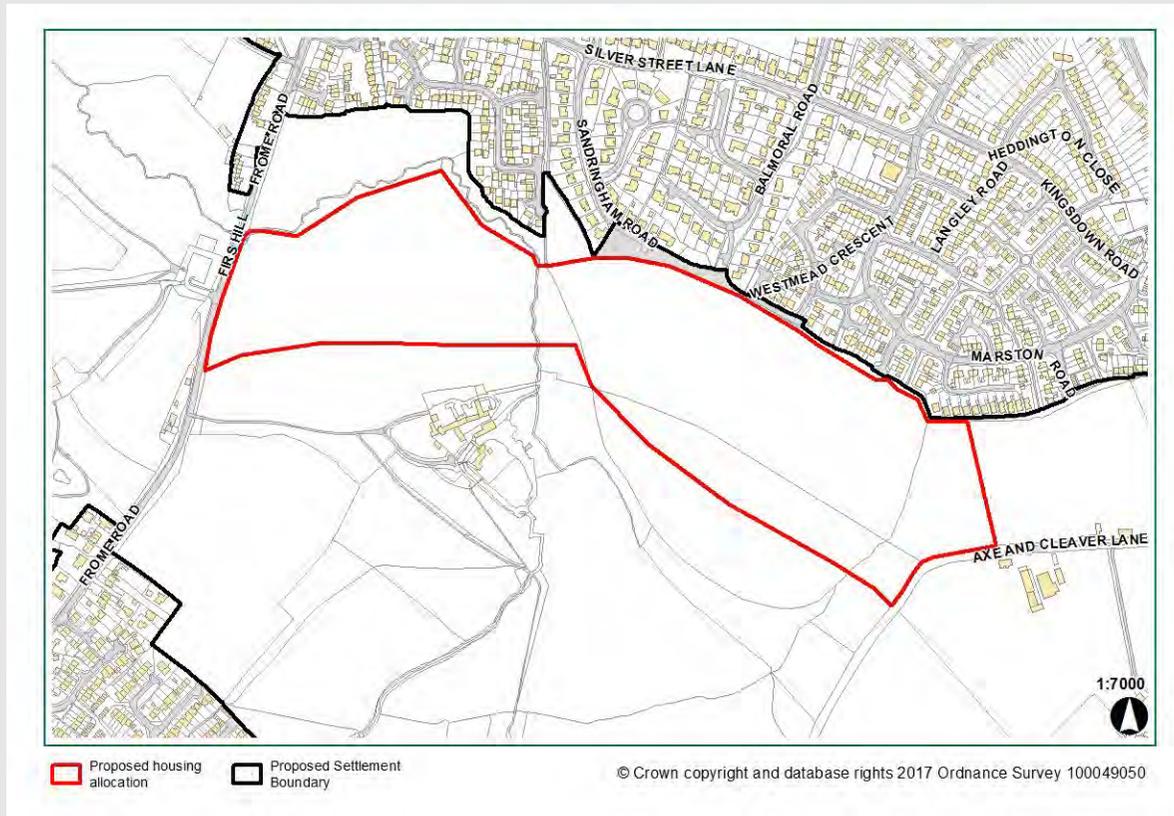
## 7.12 Land off the A 363 at White Horse Business park

The site comprises 25.26ha of land and the anticipated number of new homes is approximately 150.



### 7.13 Southwick Court

This site is located mainly in Southwick Parish, but has a small component in North Bradley Parish. The site is approximately 18.17ha in size and it is suggested that 180 homes could be accommodated there.



7.14 While the need to accommodate some additional housing is accepted, this would not be sustainable if it destroyed the landscape setting of North Bradley. The Landscape Setting report given as Appendix 8 shows how evidence clearly differentiates between the impacts of these schemes. The conclusions of this report are accepted and taken forward by this NDP and form the evidential core backing this policy.

- 7.15 The site at Elm Grove Farm is on the north side of the A363 next to the built form of Trowbridge. In many ways, this is an ideally located site, which seems likely to deliver sustainable development for reasons given in the DPD and its evidence base. It is therefore duly supported by this NDP as an acceptable location for housing or mixed-use development. Because the site is already being taken forward in the Wiltshire Housing Site Allocations DPD it is not considered to be necessary to formally allocate it in this plan.
- 7.16 On the other hand, both the Land Off the A363 site and the one at Southwick Court involve considerable harm to the landscape setting of North Bradley - most particularly the former. Of the former site, there also seems to be likelihood of harm to local Bechstein's Bat (a rare and protected species) as evidenced by the DPD itself. These sites are therefore opposed by the DPD as they would conflict with the Landscape Setting Policy (Policy 1). The Parish Council has made a formal consultation response to this effect during the consultation on the HSAP.

7.17

**Policy 1: Landscape Setting and Housing Site at Elm Grove Farm**

The landscape setting of North Bradley village (being the open spaces between the village and Trowbridge on the one hand and the village and White Horse Business Park on the other, as shown edged green on the map below) will be preserved and if possible enhanced for both biodiversity and recreation as appropriate.

No significant development (for example medium or large scale housing schemes) will be permitted in the 'North Bradley Gap' shown on the policy map except in accordance with Wiltshire Core Strategy Policy and as envisaged in the Landscape Setting Report provided as Appendix 8 of this plan.

Where development is permitted in compliance with this policy, it must satisfy the following additional criteria;

- The openness and landscape value of the Gap must not be compromised nor the rural setting of North Bradley harmed
- Existing facilities for informal recreation must be preserved and enhanced
- The scheme should enhance local biodiversity and habitat in particular for Bechstein's bat.

**7.18 Main Evidence Base**

Wiltshire Council Core Strategy 2015 Policy 29 (especially paragraph 5.150)  
West Wiltshire Landscape Character Assessment 2007  
Wiltshire Open Space Study (2015)  
Wiltshire Housing Sites DPD Consultation Draft and evidence base, including HRA  
Consultation Responses from Community Engagement  
Landscape Setting report given as Appendix 8 to this plan.

**7.19 Justification**

The chief aim of the policy is to take forward Wiltshire Core Strategy Policy in preserving the separate identity and landscape setting of North Bradley. However, the plan does not seek to impose a blanket restriction all around the village since this seems unreasonable. It is not the aim of the plan to stop all development around the village, but to preserve the openness of the rural setting between North Bradley and Trowbridge. More detailed justification is found in the Landscape Setting report given as Appendix 8.

**7.20** The policy has secondary aims, reflecting the other important reasons why the spaces are so valued; as a resource for local biodiversity and recreation and sport (e.g. Trowbridge football ground which forms part of the 'Gap' to the north west). It is the aim of the policy to enhance these secondary elements of the Gap's importance for the benefit of the environment and community and in the interests of achieving sustainable development over the Parish as a whole.