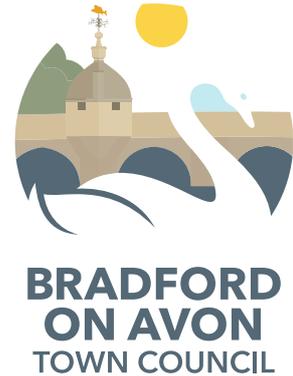


Town Council Public Statement

Response to the Consultation on the Draft Wiltshire Local Plan



At a full meeting of the Town Council 2 March 2021, to reject the Wiltshire Local Plan in its entirety for not only our town, but the whole county. It is not so much a plan, as an allocation of houses in unsuitable places. It lacks vision for the future of our communities and our county.

It lacks integration and due consideration with other key strategies such as Highways and Blue Green Spaces, and many other infrastructure issues. It does not recognise or take appropriate account of our Neighbourhood Plan. It is, at best, a 'business as usual' plan, intended simply to mark time to 2036; it does not address the Climate Emergency in any meaningful way and would not attain our shared target of Carbon Neutral by 2030, but would take us backwards.

We reject all three green sites proposed for housing, for the reasons laid out below. It clearly does not appreciate the true value of the land for our wellbeing, the environment and biodiversity and how much is lost irretrievably, by developing on these kinds of sites.

Given the declarations of Climate and Ecological Emergencies by Bradford on Avon Town Council, the declaration of a Climate Emergency by Wiltshire Council, duties under law to promote biodiversity and address air quality and other environmental concerns, it would not be reasonable for the sites listed as Potential Development Sites to be maintained as such, and the impact on those duties of other developments in the surrounding area must also be considered in respect of those duties.

As noted in other correspondence to Wiltshire Council, we also feel that the community consultation process has been wholly inadequate.

The Plan as a whole

The focus on housing numbers, rather quality and impact on heritage or greenspaces, seems to be an over-simplified basis for the Plan, especially as it is based on outdated [2014] formula that places high housing targets on rural counties. Wiltshire Council is putting unsustainable pressure on our towns and parishes' ability to cope, and abusing the very concept of 'sustainable development'.

Worse still, Wiltshire Council has agreed to take on an additional 5,000 houses above the approximately 41,000 prescribed under this formula, putting yet more pressure on our Climate and environment. It even proposes to accommodate some of this by selling off County farms for short term gain, whilst neglecting to consider brownfield development or include as part of its housing figures.



If Wiltshire Council pursues this Plan as is, there is no chance of achieving Climate targets for 2050, let alone the aspirational target for 2030 set by many of its towns and parishes.

In the present circumstances, the Town Council considers the scale of growth (up to 80 additional dwellings) is potentially appropriate, only providing that:

- there is sufficient available brown-field sites within the existing town curtilage to accommodate that number of dwellings without encroaching on the green-belt. The Green Belt restricts the potential for green field sites and there do not appear to be any advantages in seeking to amend this;
- highly inappropriate sites including the Woolley Allotments, the old golf course, and other areas of high amenity value to the community and biodiversity are excluded from development;
- priority is given to (i.e. the majority of future development is) social housing (housing at an affordable rent and with security of tenure), and low-cost housing for first time buyers and for those that wish to downsize;
- strict conditions on the quality of new development ensure consistency with zero carbon and biodiversity targets;
- the details of growth can be determined at town-level.

The Town Council questions the assertion that there is no requirement for additional employment land and requests further information on how this conclusion was reached. Large areas of former employment land have been converted to residential use in recent years and there is circumstantial evidence that those considering a business move to the town are deterred by a lack of suitable sites or buildings for anything other than a small business. Furthermore, the recovery of the small businesses after COVID may be exacerbated by the increasing ease of change of use, resulting on potential permanent damage to our vibrant town centre.

Housing development

Development needs to be contained with the Settlement Boundary to prevent sprawl and to enhance the potential for properly sustainable living. This indicates that development should be contained within the already developed area, preferably on brown-field and infill sites. House prices in Bradford on Avon restrict the ability of the lower-paid local workforce to live in the town and this problem needs to be addressed, with right-sized affordable accommodation and potentially community-led housing projects.

The Housing Needs assessment conducted for the Neighbourhood Plan clearly indicates that the town does not need the type of 'executive homes' favoured by the national housing developers, as we have seen in recent developments here and across Wiltshire. This type of housing has a large land-footprint and carbon-footprint and ill-suited to the small amount of land available for new dwellings in the town. We need to prioritise our land use very carefully.



The requirement is for co-operative/social housing to rebalance the housing mix and provide for the changing demographic of Bradford on Avon and this should be a priority in any new housing.

The green spaces within the settlement boundary should be protected, as they are important to counter the densely crowded historic town-scape and this creates the positive balance for aesthetic and well-being, which also underpinning the attraction to visitors.

It is noted that Wiltshire Council is examining development potential in part of the Station Car Park, with the One Public Estate funding focused on the Health Centre, but as included in our Neighbourhood Plan this entire area could be beneficially developed and needs to be better considered as a suitable site.

The Town Council preference is for a full examination of potential sites within the framework of a Neighbourhood Plan review where local issues can be assessed in more detail.

Potential Development Sites

We do not agree that any of these sites are appropriate.

Two of the identified sites are in close proximity to areas (The Strips and Brooklands) identified as High Value Natural Assets by the Town Council commissioned Nature Recovery Report (https://uk-15a54.kxcdn.com/wp-content/uploads/2021/02/BOATC_Ecosulis_Nature-Recovery-Report-Final.pdf) and provide a level of continuity of green spaces, contributing to a green corridor. The remaining site is well-used as allotments, and in proximity to other similar Town Council owned allotments and greenspace, which will be part of the Town Council Biodiversity Forward Management Plan.

Building on these sites will therefore impact sites identified as important habitats, or which will be improved to promote biodiversity, and impede habitat recovery in these areas. Development on the sites is likely to have a significant impact on habitat and biodiversity, which public authorities have a duty to protect under the Natural Environment and Rural Communities Act 2006. The town intends to introduce green corridors throughout the town in a review of the Neighbourhood plan, with significant new documentary evidence.

The Old Golf Course

This site was fully examined in the preparation of the Neighbourhood Plan and rejected for sound reasons, including poor access, floodplain, landfill contamination, green space amenity. Full reference to the analysis is set out in the Strategic Environmental Assessment that accompanied the NP (which is supplied in support of this submission).



This site is highly inappropriate for development as it is of considerable community amenity for well-being and wildlife, and would contravene Wiltshire Council's blue-green space aspiration. Developing along the river side and on floodplain is clearly not suitable. It is also in close proximity to the Strips which have been noted as a High Value Natural Asset by the Town Council 'Nature Recovery Report' commissioned from EcoSulis (https://uk-15a54.kxcdn.com/wp-content/uploads/2021/02/BOATC_Ecosulis_Nature-Recovery-Report-Final.pdf). Development on the site is likely to have a significant impact on this habitat and biodiversity, which public authorities have a duty to protect under the Natural Environment and Rural Communities Act 2006.

Woolley allotments

This area is also a highly inappropriate site for development and should remain as community allotments because they provide high amenity value to the community resulting from the contribution they make to the locality, with well-kept vegetable plots providing local food, and significantly improved well-being for plot-holders while at the same time providing open green-space and biodiversity benefits for the community at large. There is no convenient safe access and there are landscape and important biodiversity issues. It also borders the Conservation Area.

The former Greenhouses by Woolley

There might be potential for use of some part of the land, but subject to further examination of landscape and biodiversity issues; bats, owls and other wildlife are known at this site. It is a locally much-loved and used amenity in an area that has seen a lot of development in recent years, which has seen degradation of the local environment and increased pressure on the constricted roadways.

Access to the site is difficult. It is also in close proximity to the Brooklands which has been noted as a High Value Natural Asset by the Town Council 'Nature Recovery Report' commissioned from EcoSulis (https://uk-15a54.kxcdn.com/wp-content/uploads/2021/02/BOATC_Ecosulis_Nature-Recovery-Report-Final.pdf). Development on the site is likely to have a significant impact on this habitat and biodiversity, which public authorities have a duty to protect under the Natural Environment and Rural Communities Act 2006. It is adjacent to the Woolley Conservation Area.

Priorities

The place-shaping priorities remain relevant but there are serious questions on how these will be achieved. For example, the delivery of employment growth and retention of existing sites is a planning failure because of the number of applications for change of use to residential that have been approved. Proposed permitted development policies will exacerbate this.

Also, the provision of adequate affordable housing appears to be unachievable in present circumstances. All new housing needs to be carbon-neutral and plans to improve carbon footprint of existing housing should be imperative.



In addition, whenever more houses are considered for the town, and in the surrounding areas, there is a legitimate concern as to the carrying-capacity of infrastructure and amenities, including roads, schools, GP surgery, dentist etc., especially considering infrastructure has not kept pace with the development that has already taken place.

This will also directly affect both amenity and the environment in the town, impacting air quality and increasing health risks to residents arising from vehicle emissions, which are already known to be a significant issue. The Local Plan needs to take account of the impact on the existing Air Quality Management Zone in the town, and duties on public authorities to protect public health, noting recent links between emissions and respiratory diseases.

The large increase in housing assigned to neighbouring towns in this Local Plan draft will also significantly impact Bradford on Avon, particularly relating to the increase in through traffic, which as already noted is already creates congestion and air pollution. Wiltshire Council's Climate emergency targets are unachievable with this level of build on green spaces.

Addressing the Climate Emergency and enhancing biodiversity are key objectives of county-wide Local Plan Strategy. For Bradford on Avon with its remarkable landscape setting, these need to be included in more detail as place-shaping priorities with appropriate measures identified. This is a priority in the proposed review of the Neighbourhood Plan. Town priorities also need to be focussed on the Green/Blue aspects of the local plan revision particularly to maintain and enhance green corridors and protect biodiversity.

A missing priority is the need to recognise the landscape setting and we must ensure that this is given proper attention. It is an important characteristic of the town and one that should influence future shape and use.

More holistic flood controls need to be considered, and not just for developments over 5 houses; including grey-water and run-off use, improved soak-away and more permeable driveway material, enhancement of meadows/woodland.

Wiltshire's Local Plan should include sites and strategy to develop renewable energy, to include onshore wind where suitable. There should be permitted development for future-proofing existing properties, provided modifications are appropriate to setting.

Existing infrastructure, particularly roads and pavements, are not adequate for the current population and the growth in housing in Bradford and neighbouring towns such as Trowbridge and Melksham will cause significant problems of traffic congestion, with further decline in pedestrian safety and air quality. This will be compounded by Bath's CAZ starting 15th March 2021.

Investment in (green) public transport and improvements in the road system are improvement. Retention of the current 'temporary' COVID distancing scheme would be a good start, alongside traffic calming along New Road, Trowbridge Road and elsewhere and



better pedestrian crossings on the Town Bridge and New Road, and elsewhere as necessary, and all properly signed. A 20mph limit, with suitable signage within the entire settlement area would be a reasonable measure.

There is a missing section in the Settlement Profile related to the need to protect the historic quality of Bradford on Avon as one of the most important former industrial towns in the South West. We are extremely fortunate that previous generations have left us with a town that offers a high quality of life and it is this quality that is key to its economic future.

Additional factors for consideration

- Provision of new homes for all sections of the community based on the demographic. The demographic changes outlined in the draft Local Plan seem based on or driven by the types of properties available, which, because they have not matched housing needs identified in the Neighbourhood Plan, do not allow for sufficiency of opportunity to downsize, or for first-time buyers and younger people to enter the housing market. Demographic shifts are therefore in part being driven by housing development and lack of coherent policy;
- Recognition of the importance of the historic built environment to the economic life of the town. (many of our businesses are visitor and recreation focussed), including the need to protect key habitats, settings and views;
- The Town Council has declared a Climate and Ecological Emergency. The Local Plan does not address these, nor sufficiently allow for the impact either of 80 additional dwellings within Bradford on Avon, or other much larger developments in the surrounding areas, which will directly impact habitat, land-use, pressure on shared infrastructure such as health facilities, schools and shops;

