

Application PL/2026/02943 (Response from Bradford on Avon Town Council)

Land off Trowbridge Road, Bradford on Avon

PART 1

The Principle of Development of 224 Dwellings, 72 Bed Care Home and Site Access (the matters for determination)

The Town Council OBJECT to the proposed development of the site for the following reasons;

1 Proposal Location is not Allocated and Outside of Defined Settlement Boundary

The proposed site is for major development of unallocated land outside the limits of development defined by Wiltshire Core Strategy (WCS) in the open countryside. The proposed development is contrary to;

WSC Policies;

- CS1 Settlement Strategy for Wiltshire
- CS2 Delivery Strategy
- CS7 Spatial Strategy for BoA Community Area

Bradford on Avon Neighbourhood Plan (BoANP)

- Policy H1 (Support for infill (only) development)

2 Development in the Green Belt

2.1 Inappropriate Development in the Green Belt in Principle

The site is wholly within the Western Wiltshire Green Belt.

In principle the proposal is inappropriate development in the green belt and should be refused, in conformity with NPPF Para 153.

153. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness⁵⁵. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Furthermore, Wiltshire Core Strategy (Landscape Policy 51 (background text)) states that '*Applications for development within the Green Belt will be determined in accordance with national planning policy.*'

Whilst Wiltshire Council has a current significant shortfall in allocated and developable land for housing, sufficient to engage National Planning Policy

Framework (NPPF) (2024) Para 11(d), presumption in favour of sustainable development ‘tilted balance’, this does not apply on land within the green belt.

‘...where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- l) the application of policies in this Framework that protect areas or assets of particular importance (which includes the green belt) provides a strong reason for refusing the development proposed;*

The Town Council consider the site to be open countryside that makes an important contribution to the purposes of the green belt and the harm to these caused by the proposed development would significantly outweigh the benefits of the proposal directly and set a precedent that could undermine the wider green belt.

2.2 Failure to Demonstrate Development is Not Inappropriate in the Green Belt

It is recognised the NPPF provides opportunities for development within the green belt to be considered ‘not inappropriate’ and be granted consent. The Town Council consider the circumstances, site and proposal do not meet criteria to be considered ‘not Inappropriate’ development in the green belt. The reasons for this are set out below with reference to NPPF (Para 155).

‘The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:’

- (a) **The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;***

The site is not previously developed or despoiled land. It is also not considered to make a weak contribution to any one of the three criteria (relating to purpose a, b and d of the five purposes of the green belt) necessary for it to be reasonably considered Grey Belt land as set out in NPPF Paragraph 155 and associated National Planning Practice Guidance.

- **Purpose (a) to check the unrestricted sprawl of large built-up areas;** BoA is by size and definition a ‘large urban area’. The town has a population of +10,000. It is defined by Wiltshire Council Core Strategy as a Market Town and a strategic settlement. The proposed development represents inappropriate, un-planned and harmful ‘sprawl’ of a ‘large urban area’ into the green belt.
- **Purpose (b) to prevent neighbouring towns merging into one another;** The development site forms a significant 32-hectare parcel that is part of a relatively narrow (c2km) undeveloped open countryside green belt buffer between BoA and Trowbridge. Whilst partially screened by woodland to the

east, it enables wide and open views across the River Avon and adjoining green belt land and is likewise visible from various open countryside viewpoints relating to public footpaths (ProW).

The site makes an important contribution to preventing the merging of towns in a particularly narrow and valuable part of the Green Belt. Development would significantly and harmfully erode this open land separation contrary to purpose (b) of the green belt.

Woodland is not development and is not considered to constitute a development edge that contains the site.

- **Purpose (d) to preserve the setting and special character of historic towns**

BoA is a distinct and historic town within its rural setting. The site makes an important contribution to the distinctiveness and rural setting of the town its separation from Trowbridge.

The site's rural character also provides the setting of the Grade 2 listed Widbrook Bridge which is part of the historic character for the town.

The development would harm the distinctive identity of BoA as an historic town and the immediate setting of a designated heritage asset.

Wider Impact

'.....would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan'

It is considered this proposal could fundamentally undermine the purposes of the remaining Green Belt within the WCS area.

Individually the proposal significantly erodes a 2km green belt buffer between towns and seeks to establish that undeveloped natural rural features are screens and justified containment.

This approach risks creating a precedent that could employ similar inappropriate criteria to undermine the overall purposes of the Green Belt to prevent encroachment into the countryside, valuable rural gaps being harmfully eroded and large urban areas sprawling and merging.

Housing Need

(b). There is a demonstrable unmet need for the type of development proposed;

It is recognised that due to changes in the Government's mandatory housing requirement calculation method and the withdrawal of the Local Plan, there is a current shortfall in developable housing land across Wiltshire.

However, it should be noted that Wiltshire Local Plan 'Planning for Bradford on Avon' provides evidence to inform a sustainable approach to future growth at BoA that

responds to previous high levels of growth and the town's heritage and sensitive environment.

'Bradford on Avon is a small market town heavily constrained in environmental terms by the position of the greenbelt that surrounds the town. There have been several large-scale developments in housing and employment growth at the town, as planned for in the Wiltshire Core Strategy. The priority for the town is delivering a moderate scale of growth, to help sustain and enhance current levels of services and facilities and promote better levels of containment, whilst maintaining the historic and landscape values of the town.'

It should also be noted (see Sustainability below) that the site is within the Bath and BoA Bat SAC, adding weight to the site's protection.

In the context of BoA's previous growth, there is not therefore a demonstrable severe unmet need for housing and its heritage and environmental designations require that sustainable development must include their protection.

Sustainable Location

(c). The development would be in a sustainable location,

The site is not considered to be a sustainable location for this proposal.

- **Biodiversity;**

The site is within the Bath and BoA at Bat Special Area of Conservation (SAC) Core Area. NPPF Para 194 states this should be applied in relation to a SAC in relation to Para 195.

NPPF Para 195 applies.

'The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site.... , unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.'

The Town Council considers that the proposed residential development of this site is highly likely to have a significant effect on the SAC.

The Town Council notes that the site is located in proximity to internationally, nationally and locally designated sites for nature conservation. Whilst the applicant has submitted an Ecological Impact Assessment with proposed mitigations this is not considered to have addressed the requirements of the NPPF until it is assessed by Wiltshire Council's ecologist, until this is adequately addressed, The Town Council consider the application has not provided sufficient evidence to demonstrate the scale of effect and appropriate (if feasible) mitigation with regard to NPPF Para 195 , WCS Policy 50, BoANP Policy GS2 (Development affecting known wildlife sites) and 'Wiltshire Bats SAC Planning Guidance'.

Unless this is achieved to the satisfaction of WC, the Town Council consider the proposed site and development of the site environmentally unsustainable.

- **Transport;**

In the context of this proposal use and scale, the Town Council does not believe the site can be made a sustainable location to address NPPF Para 110 and it will result in significant adverse air quality and congestion issues within the town. This is contrary to NPPF Sustainable transport Paras 115 and 116 and WCS Policies 61 (Transport and Development).

It is a recorded fact that traffic congestion and air quality are particular and acute issues for BoA. WC 'Planning for BoA' notes, '*There are problems with high traffic volumes and congestion in the town centre and an Air Quality Management Area (AQMA)...*'

Pending further detailed considerations of air quality impact and transport impacts reports by Wiltshire Council, The Town Council considers the proposed development of 224 dwellings and the traffic movements associated with the proposed 72 bed care home will risk adding a volume of vehicle movements across the town that will unacceptably exacerbate AQMA issues and congestion across the network of historic town centre streets and adversely impacting health, safety and the local economy. Subject to further detailed assessment it considers the application has not demonstrated how it would meet the criteria of WCS Policy 55 (Air Quality) and potentially not addressing requirements of Policy 62 (Impacts on the Transport Network).

The application seeks to resolve the only access onto Trowbridge Road for the entire development, which will include (as yet unspecified parking associated with public use of open spaces and football field.

Pending further assessment of detailed access proposals by Wiltshire Council, The Town Council expresses severe concern this access will not provide safe and sustainable multi-modal access in the context of Trowbridge Road and the expected volume of movements.

The Town Council does not accept the site to be well-connected to local facilities sufficient to realistically encourage sufficiently high levels of walking and cycling to avoid or materially reduce unacceptable increases in traffic impacts. Distances stated to a number of facilities are inaccurate, tilting the impression of the site's sustainability. Walking distances to town centre facilities are not convenient or attractive. Cycling facilities along Trowbridge Road do not exist.

Within the site, all internal connections and permeability necessary to encourage walking and cycling are illustrative only. Without prejudice to the in-principle objection, The Town Council is concerned these must be secured as elements of access proposals for determination.

- **Water Management**

BoA is severely and particularly vulnerable to the impacts of flooding with large areas of the town centre area within high-risk flood zones 2 and 3. The Environment Agency forecast this issue is highly likely to worsen as a result of climate change. Whilst the site is largely outside of the current high risk fluvial flood zones, it is in close proximity to the River Avon and up-stream of the town centre. The Town Council share the concern and objection expressed by the Drainage Authority in its consultation response (1 June) and expresses its strong concern that a development of the proposed scale on this site will further exacerbate the instances and impacts of flooding within the town centre and elsewhere, including down-stream from the site, contrary to NPPF Para 181 and WCS Policy. There is a lack of evidence to demonstrate that this will be avoided.

- **Agricultural Land**

- The Town Council notes that no Agricultural Land Classification (ALC) assessment has been submitted in support of the application, despite the proposal including the development of agricultural land currently used for arable production. In order to assess the potential impact on Best and Most Versatile (BMV) agricultural land, the Town Council requests that the applicant submit a detailed Agricultural Land Classification (ALC) survey, undertaken in accordance with the MAFF ALC Guidelines, to determine whether any part of the site comprises Grade 1, Grade 2 or Subgrade 3a land.

- **Heritage and Archaeology**

Based on local knowledge regarding the presence of Roman and Palaeolithic remains in the area, the Town Council is concerned that archaeological surveys provided by the applicant do not adequately identify or assess the richness and archaeological and heritage value of the site.

For the primary reasons above, The Town Council do not consider the application has demonstrated the site to be capable of being made sustainable in relation to this proposal.

The Golden Rules

d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.

The development application seeks to establish the principle of development and access. This includes provision of 50% affordable housing. The Town Council acknowledge this level of provision meets NPPF ‘Golden Rules’.

It also acknowledges that the proposed illustrative master plan shows the majority of the eastern proposal site is proposed to remain in open space uses at a level of provision that can be in conformity with ‘Golden Rules’

It is essential that areas of green infrastructure shown on illustrative plans are both shaped in consultation with the Town Council and that they are all freely made available to the public.

Should it be considered that the proposed principle of development is acceptable, The Town Council will provide further consideration to the community infrastructure provision that the development should reasonably support in the context of meeting 'Golden Rules';

3 Very Special Circumstances to Justify Inappropriate Development in the Green Belt

The Town Council recognise NPPF Para 153 provides scope for development that is considered inappropriate in the green belt where it can be demonstrated Very Special Circumstances exist that clearly outweigh harm.

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The Town Council does not consider that the application has demonstrated that Very Special Circumstances exist that would cumulatively clearly outweigh the harms of 'inappropriate development in the green belt' as set out in NPPF Para 153.

The applicant points to the current shortfall in housing land supply in Wiltshire and BoA and the inevitability that green belt land release will be required to address needs. It asserts the proposal to be justified on this basis and the promoted attributes of the site and proposal.

Town Council has recognised the weight afforded to the current shortfall in housing land across the county but addressed the distinctiveness of BoA housing need and environmental capacity above.

Wiltshire Council has committed to producing a new Local Plan within the 30-month programme required by Government. It has not established that release of Green Belt land is required to meet the Wiltshire Housing Requirement.

Wiltshire Council has not undertaken a Green Belt Review. There is no evidence that this site is the most sustainable and least valuable part of the Western Wiltshire Green Belt, when assessed in the context of other areas of the wider green belt.

Any releases of green belt land to enable necessary development should be undertaken through the proper plan-making process and the resultant adoption of WLP by Spring/Summer 2029.

For reasons set out above in relation to matters (a-d) relating to section 2 above, it is evident that this site performs a very important role as undeveloped open land in

meeting the wider purposes of the green belt as well as the distinctiveness and landscape setting of the historic town, it has a key role in the Bath and BoA Bat SAC and is not considered a sustainable location for the proposed amount of development due to transport and flood risk issues.

On balance The Town Council does not consider the applicant has demonstrated Very Special Circumstances that clearly outweigh these harms in relation to this site and proposed scheme. Taking these into account, The Town Council consider the proposal to be inappropriate development of Green Belt should be refused consent.

PART 2

3 Illustrative Plans

The Town Council provides the following comments relating to submitted illustrate material. These are without prejudice to its OBJECTION to the principle of development and does not infer conditional support.

3.1 Master Plan and Land-use Parameters

The Town Council wish to ensure structural and foundation components of the proposed development (where acceptable) that deliver Golden Rules and (only if adequately demonstrated) secure 'not inappropriate' and sustainable development are included within a set of Parameters Plans and Schedules. These are currently broadly illustrated only in the submitted Design and Access Statement and Illustrative Master Plan.

An appropriate set of Parameters material should, if acceptable, be itemised as approved plans and listed as conditional upon any following reserved matters applications.

It is suggested these may cover matters already articulated in the proposed DAS design strategy, covering at least;

- Land-use, density and layout
- Landscape, Green and blue infrastructure and Biodiversity
- Transport
- Access and Permeability
- Community Infrastructure

This approach is considered appropriate and proportionate to safeguard delivery of Golden Rules and required principles of high-quality design in conformity with Wiltshire Design Guide.

This approach has been utilised previously on similar consented schemes including resolving parameters for the outline scheme for 210 dwellings and 70 bed care home at Land South of Western Way, Melksham (PL/22/08504).

3.2 Housing Mix

The Town Council notes consultation comments from WC Housing Enabling Team (28 May 2026). Whilst in broad agreement with the matters raised, it has commissioned a local Housing Needs Assessment (AECOM 2024) to inform the review of BoANP. This indicates that the proposed development mix should be refined towards reducing the supply of single bed units in favour of two bed dwellings.

Whilst recognising the proposal has committed to 50% Affordable Housing, the applicant has stressed the severe shortfall of Affordable Housing at BoA as a contributory factor in Very Special Circumstances. In other speculative proposals where such a shortfall has been identified the applicant has committed to a higher proportion. The Town Council would welcome such a direct response from this applicant to increase the Affordable Housing proportion above 50%.

The Town Council would support increased provision of accessible homes to address the locally identified need for such dwellings for older and disabled people.