

APPENDIX 2

Wiltshire Local Plan Review

Bradford on Avon – Pool of Potential Development Sites

Site Selection Report



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Purpose

The purpose of this paper is to explain how the Council has arrived at a pool of potential development sites from which development proposals needing greenfield land may be chosen.

Context - Wiltshire Local Plan Review

1. The Wiltshire Core Strategy is the central strategic part of the development plan for Wiltshire that sets the legal framework for planning decisions and is the basis that all neighbourhood plans must follow. It covers the period 2006-2026.
2. The Wiltshire Local Plan Review is being prepared to update the Wiltshire Core Strategy with a plan period of 2016- 2036.
3. An important part of keeping the development plan up to date is ensuring that development needs are met. This means accommodating new homes, business and other new uses supported by the necessary infrastructure; and finding land on which to build them.
4. As much as possible of the land needed will be previously developed land. Inevitably, in lots of cases, to meet the scale of need forecast, towns will also expand. A challenging part of planning for the future is therefore managing the loss of countryside by identifying the most appropriate land to develop on the edges of our settlements. This is the focus of this document.
5. This paper documents the stages reached in the site selection process for the settlement and concludes by showing a pool of reasonable alternative sites that could be appropriate for development around the built up area of Devizes – a pool of potential development sites. The content of this paper explains how this set of potential development sites has been arrived at. The Council consider these sites to be the reasonable alternatives based on a range of evidence and objectives of the plan that will be further assessed, including through sustainability appraisal.
6. Development proposals can be formulated using sites chosen from this pool. How much land depends upon the scale of need for development forecast over the plan period.
7. At Bradford on Avon the requirement emerging is for an additional 350 new homes over the plan period 2016 – 2036. From this overall requirement can be deducted homes already built (2016-2019) and an estimate of homes already committed and in the pipeline in the form of either having planning permission awaiting completion, resolution to grant planning permission or on land allocated for development in the Wiltshire Core Strategy and Bradford on Avon Neighbourhood Plan. Taking account of this amount approximately 80 additional homes remain to be planned for over the plan period.
8. How this scale of growth was derived is explained in an accompanying report to this one called the 'Emerging Spatial Strategy'.

Summary of the site selection process

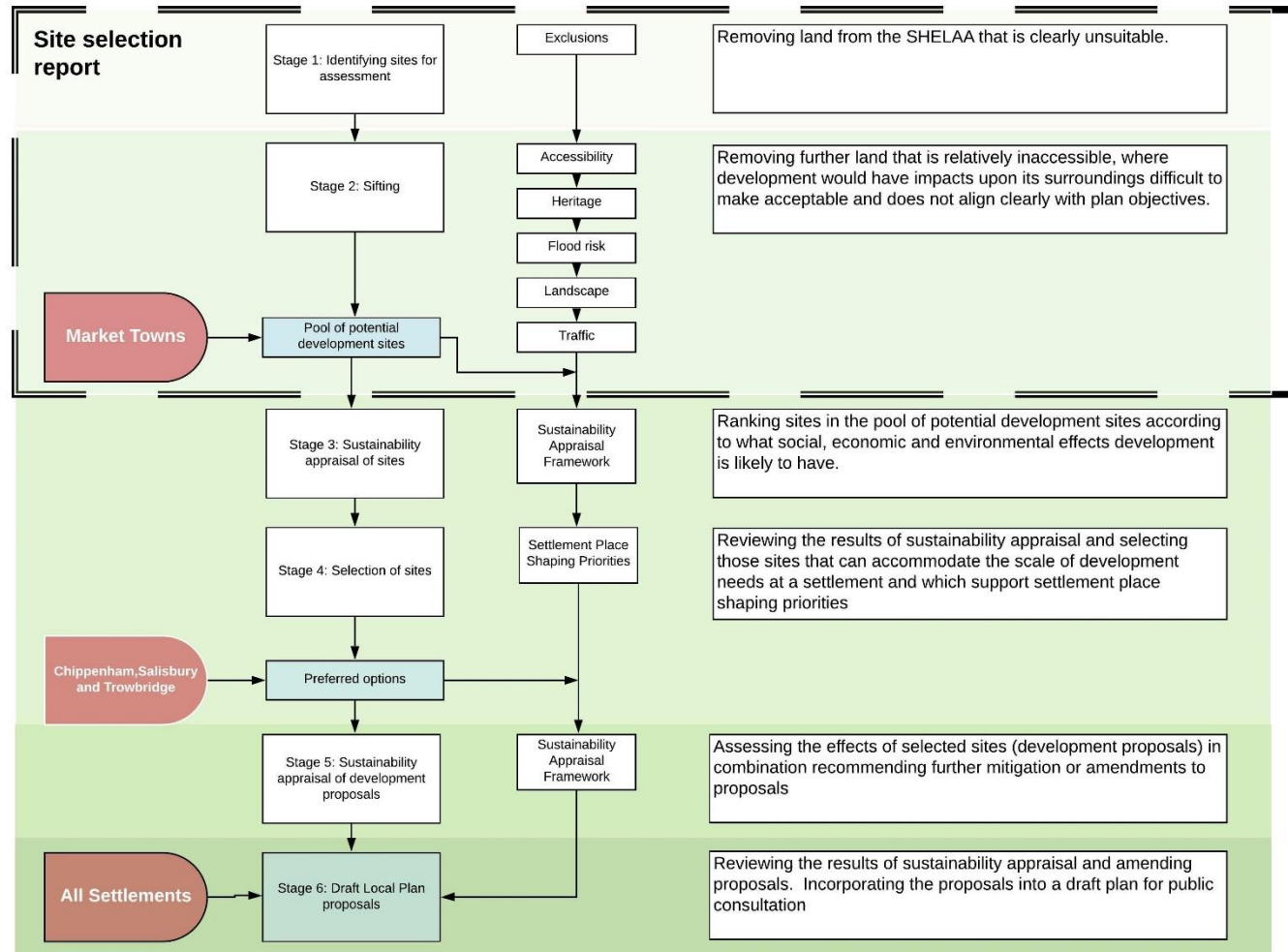


Figure 1 Site Selection Process

The starting point – ‘Strategic Housing and Employment Land Availability Assessment’

9. Figure one shows the entire site selection process. This document covers stages 1 and 2.
10. The Strategic Housing and Economic Land Availability Assessment¹ (SHELAA) provides the pool of land from which sites may be selected. The SHELAA is a register of land being promoted for development by landowners and prospective developers. Parcels of land are submitted for consideration for inclusion in Wiltshire Council’s plan, as well as Parish and Town Council neighbourhood plans².
11. Plan preparation and not the SHELAA determines what land is suitable for development as it selects the most appropriate sites.

Stage 1 - Identifying Sites for Assessment

12. This initial stage of the site selection process excludes those SHELAA sites from further consideration that constitute unsuitable land for development.

Stage 2 - Site Sifting

13. A second stage assesses further those sites that have passed through Stage 1 and results in a set of reasonable alternatives for further assessment through sustainability appraisal.
14. Using a proportionate amount of evidence³, more land is therefore removed from further consideration. It can be removed because it is relatively inaccessible and where development would have impacts upon its surroundings that would be difficult to make acceptable.
15. To determine what land to take forward for further consideration and which not, however, also involves considering how much land is likely to be needed and what areas around the settlement seem the most sensible. Such judgements take account of:
 - (i) emerging place-shaping priorities⁴ for a community (these outline what outcomes growth might achieve);
 - (ii) the intended scale of growth;
 - (iii) what future growth possibilities there are for the urban area;
 - (iv) what the past pattern of growth has been; and
 - (v) what significant environmental factors have a clear bearing on how to plan for growth.⁵

¹ Information about the Strategic Housing and Employment Land Availability Assessment can be found on the Council website <http://www.wiltshire.gov.uk/planning-policy-monitoring-evidence>

² Other land, not included in the SHELAA, may possibly be capable of development but because neither a developer nor landowner has promoted the site for development, the site cannot readily be said to be available within the plan period.

³ To meet national requirements, plans must be sound, justified by having an appropriate strategy, taking into account the reasonable alternatives, and based on *proportionate evidence*³.

⁴ The role and function of place shaping priorities is explained in the settlement statement

⁵ Regulations on the selection of sites allow those preparing plans to determine reasonable alternatives guided by the ‘plans objectives’ so long as this is explained. This stage does so explicitly.

16. It may be appropriate for some SHELAA land parcels to be combined together to create more sensible or logical development proposals. Parcels of land may therefore be assembled together into one site for further assessment. This stage allows these cases to be recorded⁶.

Next Steps in the site selection process

17. The result of this part of the site selection process is a set of reasonable alternative sites. Where greenfield land must be built on to meet the scale of need, land for development proposals will be chosen from this pool. Views on each site are invited alongside a settlement's suggested scale of growth over the plan period (2016-2036) and the plan's priorities for the community. The results of consultation will inform the formulation of development proposals.
18. Each of the sites in the pool of reasonable alternatives will be examined in more detail. They will be subject to sustainability appraisal, stage three. This assesses the likely significant effects of potentially developing each site under a set of twelve objectives covering social, economic and environmental aspects. It helps to identify those sites that have the most sustainability benefits over those with less. It also helps to identify what may be necessary to mitigate adverse effects and what measures could increase benefits of development.
19. The most sustainable sites are those most likely to be suited to development. Sustainability appraisal may recommend sites, but it is also important to select sites that support the plan objectives and strategic priorities for a settlement, in particular. Carrying out this selection of sites is stage 4.
20. Stage 3 sustainability appraisal looked at how each potential development site performed individually. Stage 5 carries out sustainability appraisal looking at development proposals together and what effects they may have in combination. This will lead to amended proposals and more detailed mitigation or specific measures to maximise benefits from development.
21. Development proposals are also subject to more detailed assessments; by viability assessment to ensure that they can be delivered and by assessment under the Habitats Regulations in order to ensure no adverse effects on Natura 2000 sites. The results of these steps may amend development proposals.
22. Stage 6 therefore draws in the work of viability assessment, habitats regulation assessment and sustainability appraisal to produce proposals that can be published in a draft version of the reviewed Local Plan, which will then be published for consultation.
23. As stated previously, this document only covers stage 1 and 2 in detail. These stages are described further in the following sections.

⁶ Land promoted for development is defined by land ownership boundaries and over what land a prospective developer has an interest. It does not necessarily represent what land is needed for a logical or sensible development proposal. A logical proposal may be smaller or larger or combine different owners' interests.

Stage 1 Identifying Sites for Assessment

24. This stage starts with all SHELAA land parcels on greenfield land at the edge of Bradford-On-Avon and ensures they are appropriate for site selection. Land parcels that are not or could not be extensions to the existing built up area are not included. Figure 2 shows the 12 sites have been excluded as they are within green belt.

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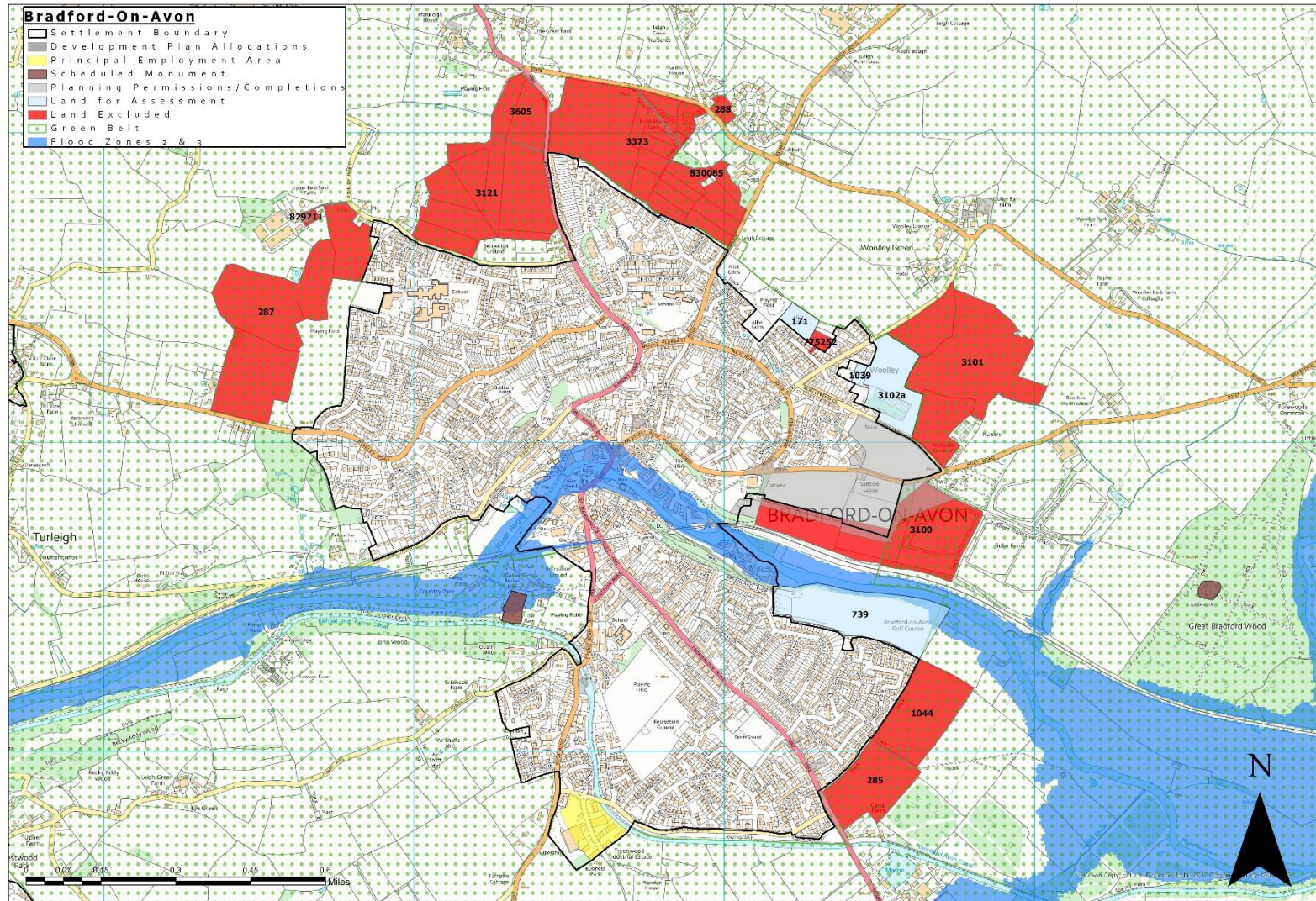


Figure 2 Map showing SHELAA land excluded at Stage 1

Stage 2 Site Sifting

Methodology

25. This stage of the site selection process sifts out sites to provide a reasonable set of alternatives for further assessment. There are two parts to this stage of the process (A) accessibility and wider impacts and (B) strategic context.

A. Accessibility and wider impacts

26. Firstly, the individual merits of each site are assessed to understand their strengths and weaknesses in terms of how accessible a site location may be and what wider impacts could result from their development. Sites more likely to have unacceptable impacts or which are relatively inaccessible are less reasonable options.

Accessibility

27. Sites that are relatively inaccessible are much less likely to be reasonable alternatives and may be rejected from further consideration.
28. Accessibility is represented as a heat map of travel times on foot, cycling and public transport to important destinations for residents - the town centre, principal employment areas (including employment allocations), secondary schools and hospital and health centres (including GP surgeries).
29. Sites are categorised overall as low accessibility (red), medium accessibility (amber) or high accessibility (green).

Wider impacts

30. **Landscape:** A site that creates a harmful landscape or visual impact that is unlikely to be successfully mitigated may be rejected.
31. **Heritage:** Assets outside the sites under consideration may be harmed by development. This stage identifies where those assets are, their nature and importance, and assesses the potential for harm that may result from the development of some sites.
32. **Flood Risk:** All land on which built development may take place, by this stage of the selection process, will be within zone 1, the areas of the country with minimal flood risk. Flood risks from all sources are a planning consideration, this step will identify sites where development may increase risks outside the site itself.
33. **Traffic:** Developing some sites may generate traffic that causes an unacceptable degree of harm, in terms of worsening congestion. Others may be much better related to the primary road network (PRN). This can lead to other harmful impacts such as poor air quality or impacts upon the local economy.
34. The results of each of these 'wider impacts' assessments are gathered together and categorised as high (red) , medium (amber) and low (green) level of effects for each site under each heading.

B. Strategic Context

35. Having gained a picture of the relative strengths and weaknesses of each site, the next step is to draw this information together and decide which ones would be part of a pool of reasonable alternatives and which ones not.
36. Unlike the first part of this stage, this requires judgement about what pool of possible land for development constitutes a set of reasonable alternatives for consideration at a settlement. This must not pre-judge more detailed testing of options but rule out others that are clearly less likely to be characterised as being reasonable options and therefore unnecessary to assess in greater detail at later stages.
37. The distribution and number necessary to provide a reasonable pool of alternative sites can be influenced by each settlement's role in the spatial strategy and the scale of growth to be planned for, by the pattern of growth that has taken place at a town as well as significant environmental factors. This is called the site's strategic context.
38. Whilst the first set of evidence provides information about each individual site, evidence in the form of a settlement's 'strategic context' provides the basis for further reasoning by which some land parcels are selected for further consideration and others rejected. They can indicate future growth possibilities, directions to expand, for an urban area.
39. This strategic context evidence describes the settlement's:
 - Long-term patterns of development
 - Significant environmental factors
 - Scale of growth and place shaping priorities
 - Future growth possibilities for the urban area
40. Referring to these aspects, there can be several influences upon whether a site is taken forward for further consideration. Common examples would be:
 - The scale of the pool of sites that will be needed. The less additional land is needed the smaller a pool of sites may need to be and so perhaps only the very best candidates need to be considered further.
 - What SHELAA sites may be consolidated into one (and sometimes which ones not). A historic pattern of growth, or the need for a new direction of growth may recommend a SHELAA site is combined with another in order to properly test such an option.
 - A desirable pool of sites might favour a particular distribution or set of locations because it might help deliver infrastructure identified as a place shaping priority for the settlement.
 - Continuing historic patterns or, in response to a significant environmental factor, looking for new directions for growth may recommend a site that helps to deliver such a course.

41. Sometimes these influences will not bear on site selection. In other instances, they may be important.
42. A description of the settlement strategic context for Bradford on Avon is shown in the table below:

Bradford on Avon Strategic Context

Context criteria	Detail
Long-term pattern of development	Historically Bradford on Avon has developed along the line of the River Avon but has seen limited growth over recent years, with the most notable extensions occurring during the 1960s – 1980s around to the south east and north west of the town. More recently, the Kingston Mills site has been redeveloped to create a mix of retail, office and residential uses and the allocated site in the Local Plan, off Holt Road, has been mostly built out. The latter is located in area to the east of Bradford that was excluded from the Green Belt in the West Wiltshire District Local Plan 2004 so that it could be safeguarded for longer term development.
Significant environmental factors	<p>The Western Wiltshire Green Belt covers a significant area close to the settlement boundary of Bradford on Avon and is a significant constraint to development.</p> <p>Air quality/traffic congestion is an issue for the centre of the town (particularly where Market Street meets Sliver Street where an AQMA has been designated). The potential for new development to help to alleviate this issue should be considered.</p> <p>Bradford on Avon is known as an historic woollen town but there is evidence of occupation since the Roman period. St Laurence Church, one of the few remaining buildings in the country dating from the Saxon period, is located close to the town centre. The history and distinct vernacular of the town and its setting is popular with tourists. This is reflected in the large Conservation Area for Bradford on Avon which covers a large proportion of the town and extends to the limits of development in a number of places.</p> <p>There are some areas of flood risk associated with the river Avon which flows through the centre of the town.</p> <p>The local area also has strong links with the Bath and Bradford on Avon Bats Special Area of Conservation.</p>
Scale of growth and strategic priorities	<p>The scale of growth is relatively low, reflecting land availability and constraints to development at Bradford on Avon.</p> <p>Strategic priorities include:</p> <ul style="list-style-type: none"> • Delivery of employment growth and retention of all existing employment sites • Provision of affordable housing to help reduce high levels of need in the town • Improved air quality within the town centre in Bradford on Avon, reducing the impact of traffic, particularly within the AQMA • Continue to conserve, maintain and enhance the unique historic architecture of the town in Bradford on Avon

	<ul style="list-style-type: none"> • Improve the pedestrian and cyclist environment through and around the town • Achieve high quality design in new buildings and the public realm that respects and responds to its context.
Future growth possibilities for the urban area	The Green Belt is a significant constraint to development at Bradford on Avon which, in combination with Local Green Spaces designated in the Bradford on Avon Neighbourhood Plan, means that there are a limited number of realistic options for meeting future housing and employment needs at the town to 2036. Brownfield development is likely to continue to play a key role in meeting the towns housing needs.

Combining sites

43. Assessment may also suggest combining sites together. To be combined land must:

- be a smaller parcel within a larger one, the smaller site will be absorbed and subsequently removed; or
- abutting each other and not have any strong physical barrier between them, such as a railway, river or road.

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Site Assessment Results

44. The following table shows the results of Stage 2. It sets out judgements against each of the SHELAA sites, taking into account both the accessibility and wider impact considerations and strategic context described above. It identifies where it may be appropriate to combine sites and which sites should and should not be taken forward.
45. The map that follows illustrates the results of this stage of the process showing those sites that have been removed and those that should go forward for further assessment through sustainability appraisal.

SHELAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B - Overall judgement	Taken Forward
171	Allotments adjacent to Coronation Avenue	Green	Green	Yellow	Red	Yellow	<p>Although the site scores a 'red' against the landscape criteria, it is a relatively small site with built up areas on two sides and a playing field on the other. Views from the north would be the most sensitive to development but possibly limited by the relatively level topography. Therefore, the potential for suitable mitigation measures to be provided should not be dismissed at this stage. Any potential impact on the setting of the Conservation Areas will also need to be considered further. Perhaps an alternative site for the allotments could potentially be secured nearby within the Green Belt in collaboration with the town council? If adjacent to the site this could achieve a softer edge between the developed area and open countryside.</p> <p>The size of the site means that it would perhaps be more suitable for allocation in a neighbourhood plan but this is not sufficient reason to dismiss the site at this stage. Carry forward to the next stage of assessment.</p>	✓
739	Golf course	Yellow	Yellow	Green	Green	Yellow	<p>This is the largest site of the remaining options under consideration. Flood Zones 2/3 covers a marginal area towards the northern edge of the site. The site is, however, also the location of a historic landfill (ref EAHLD09639) and, particularly given the relationship of the site with the adjacent river, there is a potential risk associated with contaminated land and land stability issues. The accessibility criteria for the site scores 'amber' but the assessment of accessibility at this stage is limited to proximity, rather than physical access or route. Achieving suitable physical access for the site is, however, likely to be challenging. The only access would be through the existing housing</p>	✓

SHELLAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B - Overall judgement	Taken Forward
							<p>estate onto the existing junction with Trowbridge Road. It would also mean that westbound traffic would need to travel through the AQMA.</p> <p>Currently insufficient reasons to discount this site against the criteria for this stage. These issues will need to be fully considered in subsequent more detailed assessments.</p>	
1039	Land adjacent to Holt Road						<p>This site is relatively small and lies adjacent to site 3102a and is subject to the same constraints to development in relation to its physical accessibility (see below commentary on site 3102a). It is, however, unconnected to site 3102a, with the area in between (that falls within the original footprint of site 3102a), designated as Local Green Space.</p> <p>The site is a rear garden of an existing house in a Conservation Area. It has large existing trees that provide a setting to the building. Development of this site would affect both the setting of the Conservation Area and the local green space to the east. The Conservation area Character Assessment notes the importance of views across this open area within the settlement and notes the importance of scattered fruit trees (remnants of former orchards) in contributing to the historic character of the area.</p> <p>Exclude from further consideration on landscape and heritage grounds.</p>	✗
3102a	Land North of Holt Road and North of Cemetery Lane						<p>The site is open to the north with views across the Avon Valley and clay vales.</p> <p>The Wooley Conservation Area is within 100m of the site to the east, so development of the site could potentially affect its setting.</p> <p>A large area of the site has established tree cover, which may limit the developable area.</p> <p>There may, however, be opportunity to enhance Local Green Space to the north.</p> <p>There is no access to this site via Cemetery Lane, which runs along the southern boundary of the site, because this road will be closed for vehicular access as part of the construction of the 'Bellway' development on site 3102b. It has also been established that access via Woolley Street, through a Local Green Space covering the north of the site and designated as such in the adopted</p>	✓

Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Overall judgement	Taken Forward
SHELAA							Stage 2A and Stage 2B - Overall judgement	
							Neighbourhood Plan, would be unsuitable. This was established through the recent determination of withdrawn and refused planning applications. The site is also sensitive in landscape terms and adjacent to the Wooley Conservation Area. Recent decision (19/09366/OUT) refused planning permission for housing development of this site. However, the feasibility of crossing the pedestrianised lane, or the creation of a pedestrian/cycle overpass to enable the site to gain acceptable access to the highway, will need to be considered at a later stage of assessment. Insufficient reasons to exclude at this stage so carry forward for further assessment.	

46. No sites have been combined for the next stage of assessment.

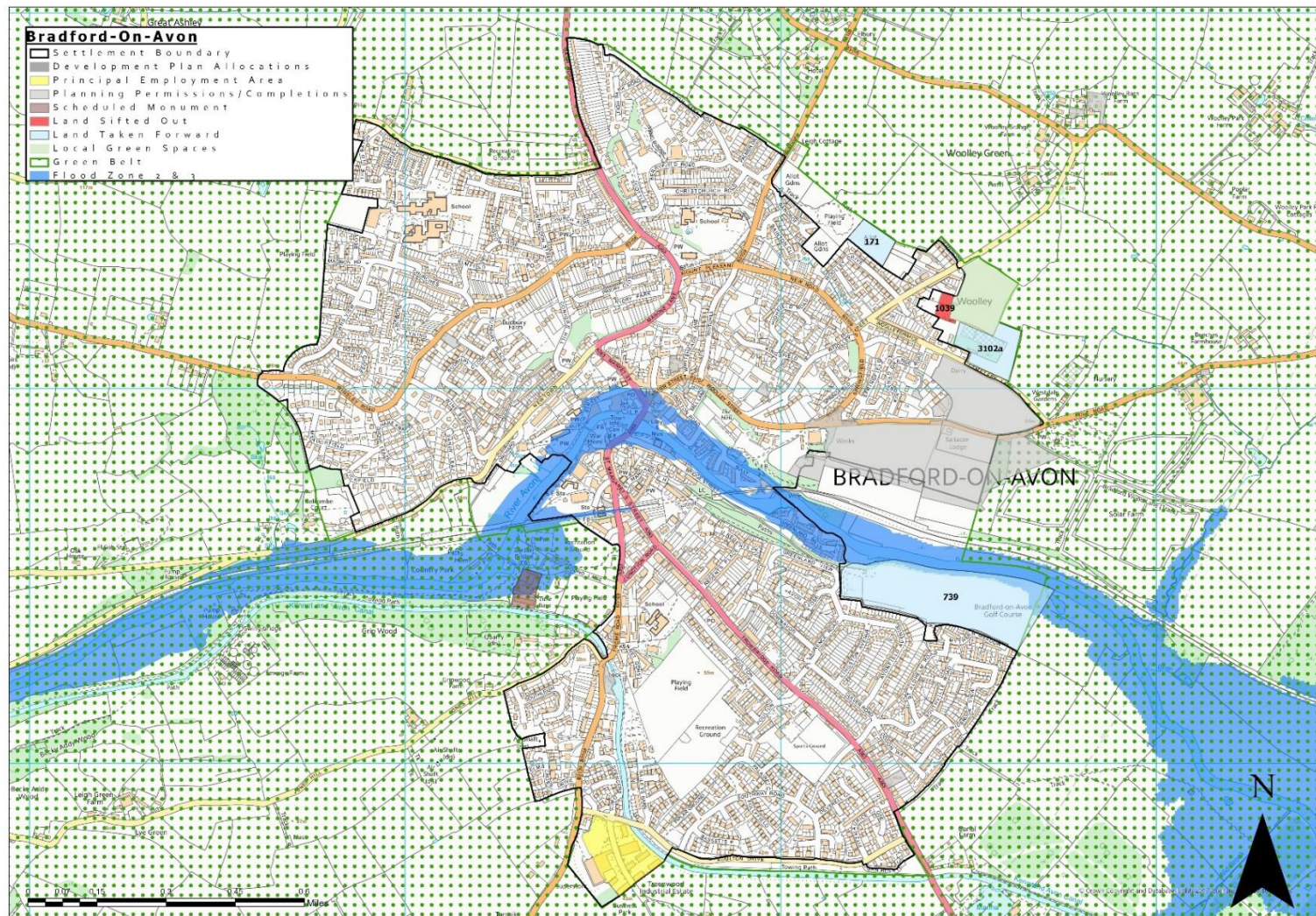


Figure 3 Map showing results of Stage 2 SHELAA land sifting

Conclusion

47. The following map shows the final pool of potential development sites under consideration. From these sites those necessary to meet scales of growth and priorities for the town over the plan period may be selected subject to the outcomes of further assessment. Consequently, only some of the sites, if any, will be developed and not every part of those sites will be developed due to the need to include land for mitigation.

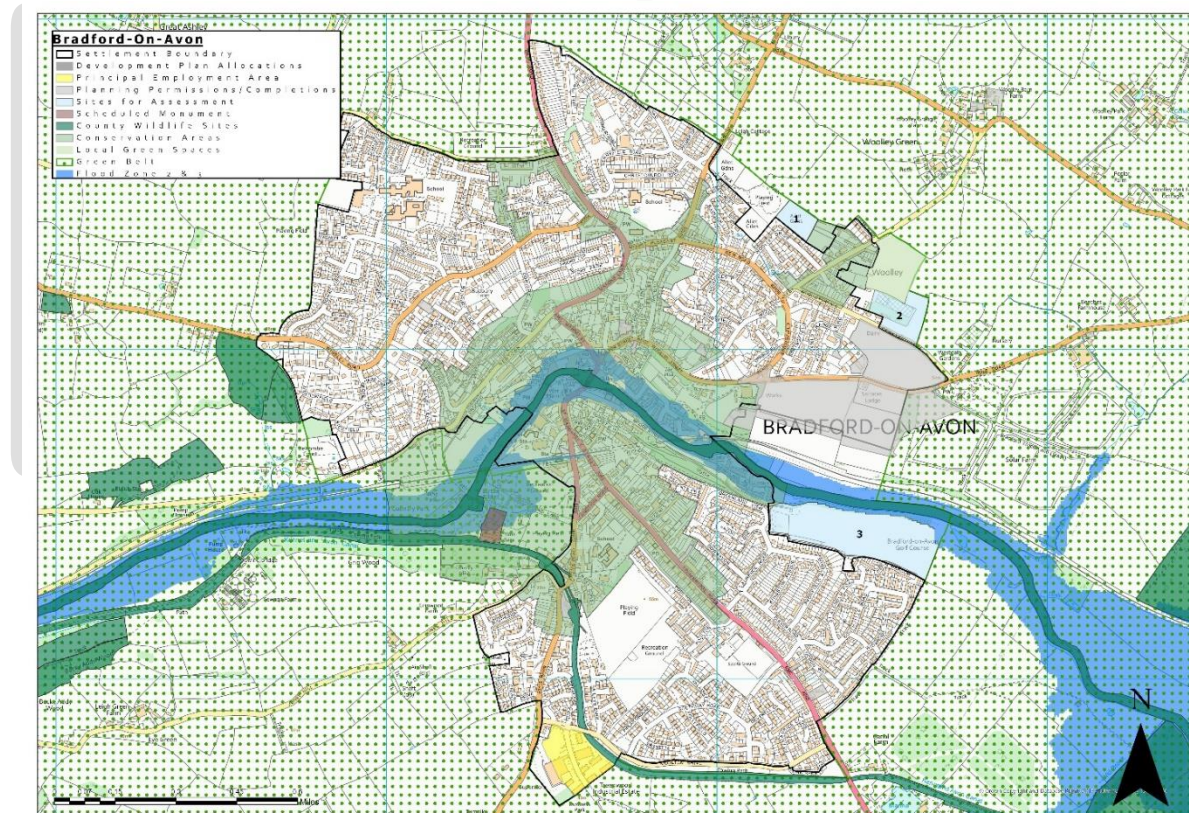


Figure 3 Map showing pool of potential development sites