APPENDIX 3

Wiltshire Housing Site Allocations Plan

Topic Paper 2: Site Selection Process Methodology

June 2017

Contents

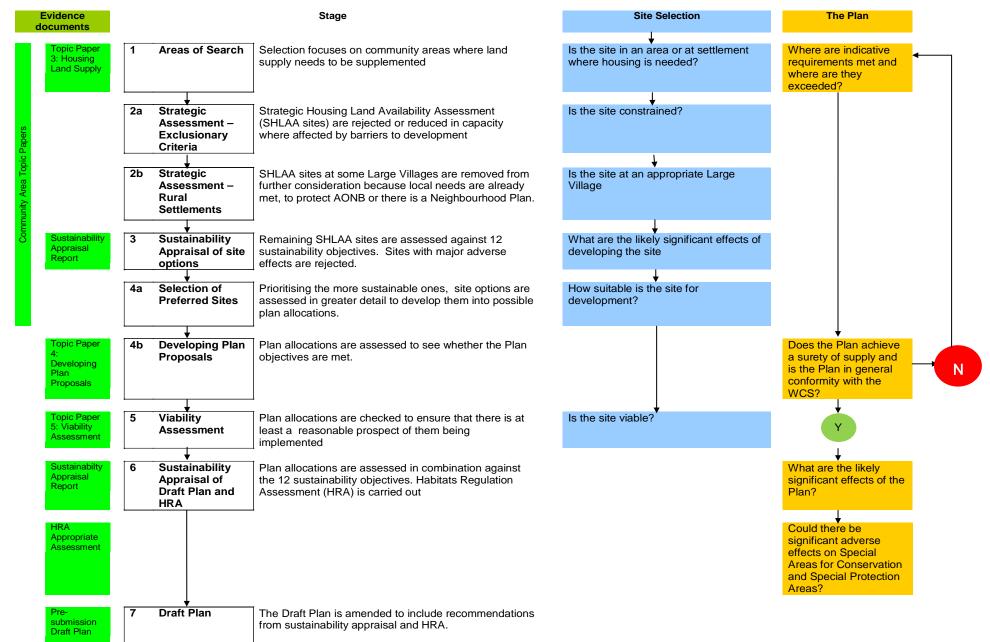
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The Draft Plan has been published supported by the following Topic Papers:

Document	Purpose
Community Area Topic Papers	Reports on stages 1 to 4a of the site selection process for each community area, including a summary of relevant outputs from stage 3.
	Reports on the process and outcome of settlement boundary review for each community area settlement
Topic Paper 1: Settlement	Explains the process followed to review settlement
Boundary Review	boundaries and how it was developed
Methodology	
Topic Paper 2: Site Selection	Explains the process followed to select preferred sites and
Process Methodology	produce plan proposals
Topic Paper 3 : Housing land	Provides the quantitative evidence for housing land
Supply	requirements
Topic Paper 4 : Developing	Reports on how preferred sites affect housing land supply for
Plan Proposals	each Housing Market Area in terms of meeting WCS
	requirements and the spatial strategy
Topic Paper 5 : Assessment	Tests the ability of sites to be developed, provide policy
of Viability	compliant levels of affordable housing and necessary
	infrastructure

Executive Summary

Stag	ge	
1	Areas of Search	Site selection focuses on community areas where housing land supply needs to be supplemented in order to meet WCS indicative levels of housing development for 2006 - 2026
Ass	Strategic Assessment – Exclusionary	Land promoted for development is recorded in Strategic Housing Land Availability Assessment (SHLAA sites). These represent the pool of possibilities for Plan proposals.
	Criteria	SHLAA sites are rejected from further consideration or their capacity reduced where affected by obstacles to development such as heritage and wildlife designations and flood plain, or because the site is already a commitment for development or located in the built up area.
2b	Strategic Assessment – Rural Settlements	SHLAA sites at some Large Villages are removed from further consideration because previous and committed development already meets those villages local needs, they are in AONB and alternatives are available or a Neighbourhood Plan for the settlement has already reached an advanced stage.
3	Sustainability Appraisal of site options	Remaining SHLAA sites are assessed against 12 sustainability objectives. Sites with major adverse effects are rejected. Other sites are divided into 'more' or 'less' sustainable site options.
4a	Selection of Preferred Sites	The suitability of site options, prioritising the more sustainable ones, is assessed in greater detail to develop them into possible plan allocations. They are checked to be sure they fit with WCS strategy and preferred sites are selected.
4b	Developing Plan Proposals	The total contribution of all the preferred sites to each Housing Market Area is assessed in terms of overall land supply and whether Plan objectives are met. The selection of preferred sites is amended if necessary and confirmed as Plan proposal.
5	Viability Assessment	Plan proposals are checked to ensure that there is at least a reasonable prospect of them being implemented
6	Sustainability Appraisal of Draft Plan and HRA screening	A draft Plan is prepared containing the Plan proposals and their likely significant effects are assessed in combination against the 12 sustainability objectives.
		The Plan is 'screened' under the Habitats Regulations as to whether the draft Plan will result in significant adverse effects upon designated sites. As a consequence, an appropriate assessment is carried out and mitigation measures proposed.
7	Draft Plan	The Draft Plan is amended to include recommendations from sustainability appraisal and HRA screening.



1. Introduction

- 1.1 The purpose of the Wiltshire Housing Site Allocations Plan ('the Plan') is established in the Wiltshire Core Strategy (WCS) to:
 - Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and
 - Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.

Settlement Boundary Review

- 1.2 The Council did not review the extent of the boundaries to inform the WCS and relied upon the former district local plans. They would instead be reviewed as a part of preparing this Plan (paragraph 4.13 of the WCS).
- 1.3 Consequently, the Council has undertaken a comprehensive review of the boundaries to ensure they are up-to-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans.
- 1.4 A separate methodology topic paper explains the review process and how it was developed¹.

The Site Selection Process

- 1.5 The WCS refers to the role of this Plan, in combination with the Chippenham Site Allocations Plan, to help ensure a sufficient choice and supply of suitable sites throughout the plan period in accordance with national policy and to compliment Neighbourhood Planning.
- 1.6 The WCS disaggregates the scale of housing required over the plan period to three separate Housing Market Areas (HMAs) shown below (East, North and West and South). The National Planning Policy Framework (NPPF) requires that each Local Planning Authority demonstrates that there is five years supply of deliverable of land for housing development for each HMA based on the implied delivery rates of the WCS requirement. Fluctuations can occur in the delivery of housing but a central objective of the Plan, ensuring surety of supply, is to sustain a 'five year housing land supply' over the remainder of the plan period to 2026.

¹ Topic Paper 1: Wiltshire Housing Site Allocations Plan - Settlement Boundary Review Methodology

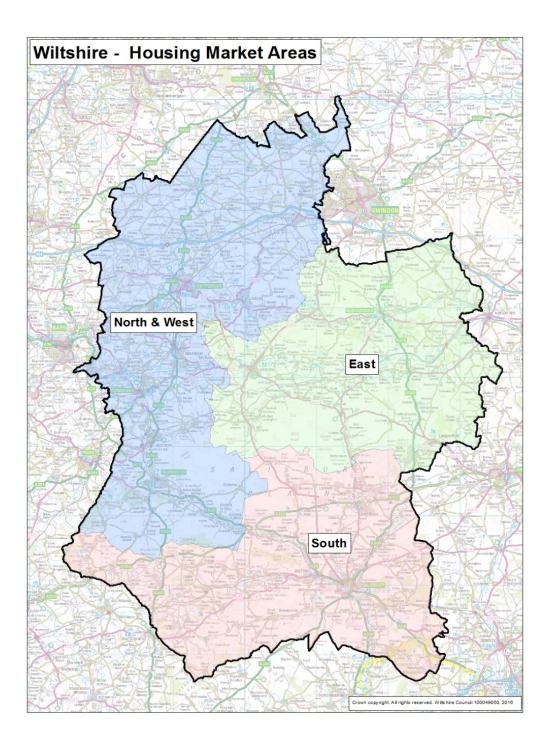


Figure 1: Wiltshire Housing Market Areas

1.7 The WCS also defines a hierarchy of settlements within the County and disaggregates indicative levels of housing to each Community Area and includes indicative requirements for the Principal Settlements, Market Towns and in the South Wiltshire HMA, the Local Service Centres and their surrounding community areas². This distribution of development directs the majority of development to these main settlements and promotes a sustainable pattern of development. The Plan's

² Paragraph 4.26 and Table 1, WCS

- allocations focus on those settlements and areas where land supply falls short of the indicative levels. In so doing it helps to deliver the WCS spatial strategy.
- 1.8 This document sets out the methodology for identifying suitable sites for housing development in accordance with the settlement strategy and housing market areas established in the WCS.

Context

- 1.9 The WCS contains a settlement strategy for managing growth over the period up to 2026. The strategy establishes tiers of settlements based on an understanding of their role and function; and how they relate to their immediate communities and wider hinterland.
- 1.10 Core Policy 1 of the Core Strategy identifies four categories of settlements, namely:
 - Principal Settlements
 - Market Towns
 - Local Service Centres
 - Large and Small Villages
- 1.11 Except small villages each of these settlements has a "settlement boundary". In simple terms, they are the dividing line, or boundary between areas of built/ urban development (the settlement) and non-urban or rural development the countryside. In general, development within the settlement boundary is, in principle, acceptable, whereas development outside the settlement boundary is, with limited exceptions, unacceptable. The WCS uses settlement boundaries as a policy tool for managing how development should take place.
- 1.12 The table below sets out the relationship between each settlement's role within the settlement strategy and the expected level of development under Core Policy 1.

Settlement	Level of development
Principal Settlement	The primary focus for development and will provide significant levels of jobs and homes
Market Town	Have the potential for significant development that will increase the number of jobs and homes to help sustain/ enhance services and facilities and promote self-containment and sustainable communities
Local Service Centre	Modest levels of development to safeguard their role and deliver affordable housing
Large village	Development limited to that need to help meet the housing needs of settlements and improve housing opportunities, services and facilities
Small village	Some modest development may be appropriate to respond to local needs and

Settlement	Level of development	
	contribute to the vitality of rural communities but limited to infill	

Table 1: Settlement Levels of Development

1.13 Core Policy 2 of the WCS also proposes a minimum housing requirement for each HMA as follows:

Housing Market Area (HMA)	Minimum housing requirement (dwellings)
East Wiltshire	5,940
North and West Wiltshire	24,740
South Wiltshire	10,420

Table 2: Housing Market Areas Housing Requirements

1.14 Table 1 and the Area Strategy Policies of the WCS provide indicative housing requirements for settlements, community area remainders and community areas.

Area	Indicative requirement 2006-2026
Devizes	2,010
Devizes CA remainder	490
Devizes CA Total	2,500
Marlborough	680
Marlborough CA remainder	240
Marlborough CA Total	920
Pewsey CA Total	600
Tidworth and Ludgershall	1,750
Tidworth CA remainder	170
Tidworth CA Total	1,920
EAST WILTSHIRE HMA	5,940
Bradford on Avon	595
Bradford on Avon CA remainder	185
Bradford on Avon CA Total	780
Calne	1,440
Calne CA remainder	165
Calne CA Total	1,605
Chippenham	4,510
Chippenham CA remainder	580
Chippenham CA Total	5,090
Corsham	1,220
Corsham CA remainder	175
Corsham CA Total	1,395

	Indicative requirement
Area	2006-2026
Malmesbury	885
Malmesbury CA remainder	510
Malmesbury CA Total	1,395
Melksham and Bowerhill	2,240
Melksham CA remainder	130
Melksham CA Total	2,370
Royal Wootton Bassett	1,070
Royal Wootton Bassett and Cricklade CA remainder ³	385
Royal Wootton Bassett and Cricklade CA ⁵ Total	1,455
Trowbridge	6,810
Trowbridge CA remainder	165
Trowbridge CA Total	6,975
Warminster	1,920
Warminster CA remainder	140
Warminster CA Total	2,060
Westbury	1,500
Westbury CA remainder	115
Westbury CA Total	1,615
•	
NORTH & WEST WILTSHIRE HMA	24,740
Amesbury, Bulford and Durrington	2,440
Amesbury CA remainder	345
Amesbury CA Total	2,785
Mere	235
Mere CA remainder	50
Mere CA Total	285
Salisbury	6,060
Wilton	0,000
Wilton CA remainder	255
Salisbury and Wilton CAs Total	6,315
Downton	190
Southern Wiltshire CA remainder	425
Southern Wiltshire CA Total	615

³ Totals for Royal Wootton Bassett & Cricklade CA remainder and Royal Wootton Bassett & Cricklade CA exclude any development at the West of Swindon.

Area	Indicative requirement 2006-2026
Tisbury	200
Tisbury CA remainder	220
Tisbury CA Total	420
SOUTH WILTSHIRE HMA	10,420

Table 3: Community Area Indicative Requirements

1.15 Paragraph 4.30 of the WCS makes clear however that:

"The disaggregation to Community Areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area. It clarifies the council's intentions in the knowledge of likely constraints in terms of market realism, infrastructure and environmental capacity. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision."

- 1.16 There are a number of sources for new homes to meet the requirements of Core Policy 2. They include:
 - strategic allocations made within the WCS
 - retained Local Plan allocations
 - existing commitments
 - regeneration projects, for example, those in Chippenham, Trowbridge and Salisbury
 - neighbourhood plans
 - windfall
- 1.17 Sites identified in the Plan supplement housing land supply providing not just an additional number of homes but improving the choice of location and house types.

The Site Selection Process

Plan Objectives

- 2.1 The Plan allocates sites for housing development to ensure enough land is allocated to help meet the minimum requirements of each housing market area. In so doing, the Plan has been prepared to achieve the following objectives:
 - 1. To help demonstrate a rolling five year supply of deliverable land for housing development.

In principle, land within settlements, in particular previously developed land, is acceptable for housing redevelopment. A realistic allowance is included for this source of new housing when calculating the scale of land supply⁴. Within a predominantly rural area however, there is a limited amount of previously developed land. Not only are such opportunities limited, they can also be difficult to rely on as a large proportion of overall supply. The consequence is that the Plan must identify a number of sites involving the loss of countryside. As the WCS recognises it is a challenge to plan for sufficient new homes in Wiltshire⁵.

2. To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy.

The spatial strategy describes a hierarchy of settlements within the County. Each tier recognises the particular role of those settlements and plans a level of new housing development that is appropriate. Chippenham, Salisbury and Trowbridge, are Principal Settlements supported by a number of market towns. Designated large and small villages all serve their rural hinterlands. Local service centres have also been identified that have a more pronounced role than villages. They possess a level of facilities and services that provide the best opportunities outside the Market Towns for sustainable development.

Stage 1: Areas of Search

Site selection focuses on community areas where housing land supply needs to be supplemented in order to meet WCS indicative levels of housing development for 2006 – 2026

Defining 'Areas of Search'

3.1 The site selection methodology, as a first stage, prioritises the consideration of housing sites at those settlements and areas⁶ where land supply needs to be supplemented in order to help meet the distribution and levels of housing provided by the WCS. These locations are termed 'Areas of Search'.

⁴ See Topic Paper 2: Housing Land Supply, Wiltshire Council, (Ju I2017)

⁵ WCS, paragraph 2.12, Wiltshire Council (Jan 2015)

⁶ Each area strategy, for each community area in the WCS, proposes a level of housing for Principal Settlements, Market Towns and the 'Community Area Remainder'. A level of housing is also proposed at some of the Local Service Centres designated by the WCS. For further information about the role and function of each tier of the County's settlement hierarchy see Core Policy 1 of the WCS and its supporting text.

- 3.2 There are WCS Core Policies for each Community Area in the County. They propose a level of housing for each Principal Settlement, Market Town and some of the Local Service Centres designated by the WCS. An approximate provision is made for the remainder of the Community Area ('the Community Area remainder'). For the purposes of this Plan these levels are termed indicative requirements.
- 3.3 Initial Areas of Search are therefore Principal Settlements, Market Towns, some Local Service Centres and those Community Area remainders, where evidence suggests additional housing land is necessary to meet indicative requirements. In these areas there is a quantified need for development.
- 3.4 With regard to Community Area remainders, Core Policy 2 limits development to infill within the existing built up area at designated Small Villages. The Plan therefore does not seek to identify land for housing development at Small Villages. Instead, where a community area remainder is identified as an Area of Search, the focus of the approach to site selection is Local Service Centres (which in the North and West and East HMAs do not have a specific indicative housing requirements) and Large Villages.

Neighbourhood Planning

3.5 Neighbourhood Plans are an important part of the planning system. The National Planning Policy Framework (NPPF) describes their role:

"Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:

- set planning policies through neighbourhood plans to determine decisions on planning applications..."
- 3.6 The Council supports passing direct powers over planning to local communities as a part of building up the resilience of local communities.
- 3.7 Referring to the role of Local Plans prepared by the Council the NPPF states:

"Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

the homes and jobs needed in the area ..."8

3.8 It is only necessary for this Plan to allocate land for housing development where it is a strategic priority to do so. WCS Core Policy 1 proposes that development at Large Villages should be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Unless there is a strategic priority to deliver the homes needed in an HMA, then the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process.

National Planning Policy Framework, DCLG, March 2012 para 156

⁷ National Planning Policy Framework, DCLG, March 2012 para 183

- 3.9 Topic Paper 3 explains that here is a high level of existing housing supply in the East Wiltshire HMA and unlike the two other HMAs, a forecast rolling supply 20% in excess of five years for all the remaining years of the plan period except the last. At the outset, therefore, it was considered unnecessary to allocate sites for housing development at Large Villages in this HMA. At this level of settlement, the priority should be for communities to meet local needs for housing through neighbourhood planning. Possible plan allocations were however still considered at Market Towns and the Local Service Centre where there was an indicative requirement.
- 3.10 Assessment at Stage 2b (see paragraph 4.16 below) looks separately at each Large Village within Areas of Search and the role being played by neighbourhood plans in meeting housing needs at individual settlements.

Community Area Topic Papers

- 3.11 Topic Papers have been prepared for all the Community Areas using a 2017 baseline for information on dwellings built or already committed compared to indicative requirements. They show how land supply will meet indicative housing requirements for the WCS plan period or whether fresh land for housing needs to be allocated in accordance with the remaining stages of the site selection process.
- 3.12 Plan allocations based on the 2017 baseline are the culmination of reviews of Areas of Search that have taken place whilst the Plan was being prepared. 2014 data was the first baseline. Since then, as work has progressed on the Plan, some areas have been excluded because they have met indicative requirements by a combination of dwellings built, existing allocations or land with planning consent. (Topic Paper 3 Table 1 shows how residual indicative requirements changed during the formation of the Plan.)

Stage 2 : Strategic Assessment

2A: Exclusionary Criteria

Strategic Housing Land Availability Assessment (SHLAA) sites are rejected from further consideration or their capacity reduced where affected by obstacles to development such as heritage and wildlife designations and flood plain, or because the site is already a commitment for development or located in the built up area.

- 4.1 All councils are required to maintain a register of land that is put forward for development. This is referred to as the Strategic Housing Land Availability Assessment (SHLAA). Within Areas of Search the SHLAA provides a pool of land opportunities for possible housing development. Sites with a capacity of less than five dwellings were considered too small for inclusion in the Plan. From this pool SHLAA sites unrelated to Principal Settlements, Market Towns, Local Service Centres and Large Villages have been excluded. Those sites remaining are therefore broadly consistent with the Plan objective of making land allocations to support the WCS spatial strategy and focus development in these settlements.
- 4.2 Other land, not included in the SHLAA, may possibly be capable of development but because neither a developer nor landowner has promoted the site for development,

the site cannot be said to be available within the plan period⁹. It cannot be counted on to supplement housing land supply and therefore, for the Plan to be effective, land other than SHLAA sites has not been considered for inclusion.

- 4.3 SHLAA sites were therefore the basic building blocks of the Plan, but they simply amount to land put forward for development 10. This does not mean any particular site is capable or suitable for development; either in part or whole.
- 4.4 For the Plan to be effective, SHLAA sites need to be suitable and capable of being built during the plan period. The availability of each SHLAA site being reviewed was also checked with its owner or promoter. The National Planning Policy Framework describes land for housing development in terms of being, 'developable', 'available' and 'suitable'.11
- 4.5 The site selection process considers their suitability to help meet housing requirements. Their suitability may be affected by a variety of different constraints. It may also be the case that SHLAA sites are not developable, for example because there is no reasonable prospect of creating a suitable vehicle access. In such circumstances, they do not represent a reasonable alternative.
- 4.6 There may be a number of barriers to development ruling out a site in whole or part: for example, SHLAA sites involving land with areas at risk of flooding or protected by a designation because of important biodiversity interests or heritage value.
- 4.7 A systematic strategic assessment has tested each SHLAA site against a number of exclusionary criteria. These were:

⁹ All those submitting a SHLAA site were contacted to confirm land was available for inclusion in the plan.

The site selection process did not consider SHLAA sites that had a gross capacity of less than 5

dwellings

Footnote 12 of the National Planning Policy Framework, DCLG, March 2012

Exclusionary criteria

- Is the SHLAA site fully or partly a commitment? Or is the site fully or partly within a Principal Employment Area, or other existing development plan allocation? Or is the site isolated from the urban edge of the settlement i.e. not adjacent to the settlement boundary and not adjacent to a SHLAA site that is?
- Is the site fully or partly within the settlement boundary
- Is the site fully or partly within one more of the following environmental designations of biodiversity or geological value?
 - o SAC
 - o SPA
 - Ramsar sites
 - National Nature Reserve
 - o Ancient woodland
 - o SSSI
- Is the site fully or partly within green belt?
- Is the site fully or partly within flood risk areas, zones 2 or 3?
- Is the site fully or partly within areas involving any of the following internationally or nationally designated heritage asset?
 - o World Heritage Site
 - Scheduled Ancient Monument
 - Historic Park and Garden
 - Registered Park and Garden
 - o Registered Battlefield

Table 4: Exclusionary critera

4.8 Some SHLAA sites were detached from a settlement's built up area. Greenfield development should take place in a way that expands an existing built up area in order to properly manage the growth of settlements and prevent the premature loss of open countryside.

4.9 SHLAA sites entirely within a settlement boundary were also excluded from the site selection process¹². In principle, brownfield sites carry a presumption in favour of development and establishing an allocation for development is unnecessary. The council may grant permission in principle for housing-led development¹³. Important brownfield sites may also advance swiftly by more flexible development briefs or more simply through the planning application process. This different approach is often more adaptable to individual circumstance and may better deliver the higher priority accorded to developing brownfield land. In accordance with national guidance, an allowance is made for windfall development. Calculated individually for each Housing Market Area, this ensures this source of land supply is fully and properly accounted for as a part of land supply. (Allowances estimated for smaller areas, such as individual towns, are difficult to substantiate and would not be statistically valid.)

¹² SHLAA sites that would no longer be within the settlement boundary as a result of boundary review were treated by the site selection process as if they were already outside.

¹³ The Town and Country Planning (Brownfield Land Register) Regulations 2017

4.10 SHLAA sites were rejected or reduced in capacity because one or more of the considerations in Table 4 applied to part of a site or the whole, leaving a smaller set of potential sites within Areas of Search. Each Community Area Topic Paper records all the SHLAA sites that are unaffected by exclusionary criteria, those that were rejected or their capacity reduced in size because of them. (An example extract is provided at appendix one of this paper.) Where reduced, the whole SHLAA area was still considered in later stages of the selection process but with a lower development capacity. Land, unsuited to development, yet within the control of a developer could be important to a scheme as a benefit (for example, as open space) or as a means to help mitigate harmful adverse effects of development (for example, by being used for tree planting).

2B: Large villages and Local Service Centres

SHLAA sites at some Large Villages are removed from further consideration because previous and committed development already meets those villages local needs, they are in AONB and alternatives are available or a Neighbourhood Plan for the settlement has already reached an advanced stage.

- 4.11 The WCS provides indicative requirements for new housing at each of the County's main settlements. It provides an approximate scale of housing development for the remainder of a community area. These areas may contain several rural settlements that do not have individually prescribed levels of development unlike Market Towns and Principal Settlements.
- 4.12 The spatial strategy requires new housing development at Large and Small Villages to be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Some rural settlements are designated as Local Service Centres where levels of facilities and local employment suggest greater potential for growth and better self-containment.
- 4.13 Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures and the Plan does not seek to identify sites of less than five dwellings.
- 4.14 On the other hand, all SHLAA sites at Local Service Centres were assessed since the WCS specifically identifies these settlements as more suited to growth.
- 4.15 Opportunities at some Large Villages, however, have not been explored because local housing needs for the plan period have already been accommodated; either through development that has already taken place or that is planned. Further development brought about by additional Plan allocations would exceed meeting local needs and result in conflict with WCS Core Policy 1. SHLAA sites at these Large Villages were not therefore considered reasonable alternatives.
- 4.16 Another factor was that for some large villages growth has already been thoroughly considered by Neighbourhood Plans, where these plans have advanced to a sufficient stage¹⁴. It is a priority of the Council for local communities to take direct

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¹⁴ Where a Neighbourhood Plan has been publicised by the Council under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012

- control over planning their settlements, as it is national policy. Alternative consideration by the Housing Site Allocations Plan would contradict that priority and conflict with policy contained in the NPPF.
- 4.17 Preparing a Neighbourhood Plan addresses the housing needs of a settlement in accordance with Core Policy 1 of the WCS. It is unnecessary for the Plan to supplement local consideration. SHLAA sites at Large Villages where Neighbourhood Plan preparation is at an advanced stage are not considered reasonable alternatives.
- 4.18 In rural areas involving Areas of Outstanding Natural Beauty (AONB), Large Villages outside the AONB are preferred locations to consider housing allocations compared to those at settlements inside the designation (provided they have not already experienced development meeting local needs and there are site options to consider). In these circumstances, consistent with national policy on AONBs¹⁵, options at Large Villages within the designation are not considered reasonable alternatives.
- 4.19 In a few cases, other reasons specific to particular Large Villages also prevented them from being considered reasonable alternatives. These instances are documented in the relevant Community Area Topic Paper and an example is included in appendix one.

Stage 3: Sustainability Appraisal

SHLAA sites are assessed against 12 sustainability objectives. Sites with major adverse effects are rejected. Other sites are divided into 'more' or 'less' sustainable site options.

- 5.1 After a high level assessment, remaining potential sites have been assessed using sustainability appraisal. This is a transparent and systematic way of carrying out a detailed assessment of the performance of all the remaining site options using a sustainability appraisal framework.
- 5.2 The sustainability appraisal framework contains 12 objectives that cover the likely environmental, social and economic effects of development.

¹⁵ NPPF paragraphs 115-116, DCLG (Mar 2012)

Sustainability Objectives

- 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 our impacts on climate change and reduce 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

Table 5: Sustainability Objectives

5.3 The performance of each site has been assessed against each of the objectives using a set of decision-aiding questions. Each option was then scored under each objective based on a generic assessment scale from major positive to a major adverse effect.

Major adverse effect ()	Option likely to have a <u>major adverse</u> effect on the objective with no satisfactory mitigation possible. Option may be inappropriate for mixed use development
Moderate adverse effect ()	Option likely to have a <u>moderate adverse</u> effect on the objective with difficult or problematic mitigation
Minor adverse effect (-)	Option likely to have a <u>minor adverse</u> effect on the objective because mitigation measures are achievable to reduce the significance of effects
Neutral or no effect (0)	On balance option likely to have a neutral effect on the objective or no effect on the objective
Minor positive effect (+)	Option likely to have a <u>minor positive</u> effect on the objective as enhancement of existing conditions may result
Moderate positive effect (++)	Option likely to have a <u>moderate positive</u> effect on the objective as it would help resolve an existing issue
Major positive effect (+++)	Option likely to have a <u>major positive</u> effect on the objective as it would help maximise opportunities

Note: Major and moderate adverse and positive effects are considered significant.

Table 6: Sustainability Appraisal- Generic Assessment Scale

- 5.4 Objectives and decision aiding questions resulted from consultation on a scoping report. The appraisal used common evidence and the process therefore ensured a transparent, consistent and equitable comparison of all reasonable alternatives.
- 5.5 Potential sites are rejected where the appraisal concludes development would result in one or more major adverse effects with no satisfactory mitigation possible.
- 5.6 The remaining potential sites in each area or settlement are compared in terms of the balance of their sustainability benefits versus adverse effects. The appraisal therefore suggests potential sites that are 'more sustainable', 'less sustainable' and rejected others. Where potential sites were rejected, the reasons for doing so are clearly stated. There is a separate draft Sustainability Appraisal Report, but each Community Area paper summarises the assessment and its recommendations.

Stage 4: Selection of Preferred Sites and Developing Plan Proposals

4A: Selection of preferred sites

4A. Selection of preferred sites

The suitability of site options, prioritising the more sustainable ones, is assessed in greater detail to develop them into possible plan allocations. They are checked to be sure they fit with WCS strategy and preferred sites are selected.

6.1 The site options that were identified to be taken forward from Stage 3 were analysed further. The focus for further work was the set of 'more sustainable' sites identified at stage 3. Further consultation with specialist consultees¹⁶ helped to develop potential sites into site options with individual housing capacities and specific boundaries.

¹⁶ Heritage, Landscape, Ecology, Drainage, Transport, Education, Public Protection specialists within Wiltshire Council, Highways England , Natural England and Environment Agency and Heritage England.

Consultation also helped to identify requirements that should be highlighted for individual site options, to guide the form development should take, including the definition of realistic site boundaries.

- 6.2 Stage 4a is carried out in five steps. Steps 1-4 are carried out for each of the 'more sustainable sites' recommended by the Stage 3 SA results. In exceptional circumstances it was necessary for further assessment of 'less sustainable sites'. Step 5 considers the area of search as a whole, selects and justifies the selection of preferred sites and concludes with a set of draft proposals.
- 6.3 **Step 1** transforms a SHLAA site into a possible draft proposal by a more detailed assessment of the significant effects identified in Stage 3.
- A range of stakeholders were invited to comment on the site options. Input was particularly targeted to address likely adverse effects and mitigation predicted by sustainability appraisal (stage 3). The capacity of some sites, for example, was reduced to allow for larger areas of landscaping to mitigate potentially harmful visual impacts. In some cases, more detailed assessment revealed that adverse effects associated with the development of a site could not be adequately mitigated or were greater than expected.
- 6.5 **Step 2** assessed how well a site may contribute to the relevant area strategy for the wider community area in terms of how much it might contribute to housing requirements, deliver the vision for the area or address specific local issues.
- 6.6 **Step 3** is a further specific assessment of whether a site at a Large Village is consistent with Core Policy 1; that it would constitute growth to meet local needs, including local housing needs. This also takes note 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.
- 6.7 **Step 4** is a summary conclusion for each site with a measure of the net sustainability benefits of each site.
- 6.8 Step 5 considered all the sites in each Area of Search together and resulted in the selection and rejection of sites. All sites that have satisfied Steps 1-3 were taken forward. This step compared the total dwellings that are provided by the pool of sites to indicative residual requirements. Where necessary, it selects and justifies site options that need to be rejected because the overall scales of development exceed that proposed by each area strategy and growth would not result in sustainable development. For example, if several site options at a large village suggest too much development, in excess of local needs, then a site may need to be rejected.
- 6.9 The result of this five step assessment were a set of draft allocations in the form of detailed site boundaries and an approximate dwelling capacity. Each Community Area Paper also identifies particular considerations connected to a given site that should be referred to by the Plan.
- 6.10 Assessments are recorded in each Community Area Paper and they use a common template of guidance (included in this paper in appendix two) and evidence sources.

4B: Testing Plan Proposals

The total contribution of all the preferred sites to each Housing Market Area is assessed in terms of overall land supply and whether Plan objectives are met. The selection of preferred sites is amended if necessary and confirmed as Plan proposal.

- 6.11 Previous stages assessed site options. Together the total amount of housing proposed in the Plan should aim to ensure overall supply at least meet housing market area requirements. The form housing land supply takes should also provide for a demonstrable supply of deliverable land for each year in the plan period. This step checked the degree to which this would be achieved with the additional of the sites preferred from stage 4a. It assessed the resilience of supply using several different tests.
- 6.12 This stage also checked how all the draft allocations together fitted with the spatial strategy; in terms of the overall distribution of housing growth; the approach to rural areas; and the role of Principal Settlements and Market Towns. The rationale for the Plan is to supplement housing land supply. This is a strategic priority stemming from the WCS. The spatial strategy expects development at villages to respond to local needs. It is Government and the Council's wish to give direct power to local communities to articulate their own visions for their area, to define and respond to their own local need. Therefore, where land supply can meet objectives of the Plan without allocating sites at villages then it should not. There is no strategic priority. This stage has therefore specifically reviewed the purpose and the case for making allocations at Large Villages.
- 6.13 This stage has also identified those sites in each HMA that are important to ensure supply and assessed whether the Plan would be in general conformity with the WCS. The results of this assessment are reported in a separate Topic Paper 4: Developing Plan Proposals.

Stage 5 Viability Assessment

To ensure preferred sites are viable and capable of development in accordance with national policy requirements

7.1 Viability assessment has verified that preferred sites and the scale of development identified in the plan are not subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It also shows that preferred sites are capable of providing policy compliant levels of affordable homes and that they are capable of contributing fully to the WCS target for the plan period. Assessment has been carried out by independent experts on this aspect and their report has been published separately¹⁷.

Stage 6: Sustainability Appraisal of Plan Proposals and Habitats Regulation Assessment

To draft Plan proposals and assess them against Sustainability Appraisal objectives, including in combination and cumulative effects

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¹⁷ Topic Paper 5: Viability Assessment

- 8.1 This stage of the assessment considered the impact of the Plan as whole, its cumulative effects as well as effects in combination with other plans and projects.
- 8.2 Following completion of the viability assessment, a further stage of sustainability appraisal was undertaken to assess whether further refinements were necessary to improve mitigation measures and to see that the Plan delivers the most sustainability benefits possible.
- 8.3 In terms of biodiversity, the impact of potential sites on European Designations is an important factor in the selection of preferred sites. The Plan as whole however is also required through the Habitats Directive and the Conservation of Habitats and Species Regulations 2010 (as amended), to consider if it may have a likely significant effect on European Sites either alone or in combination with other plans or projects. The assessment is published separately and shows there is sufficient mitigation. This included the identification of specific measures at individual plan allocations.

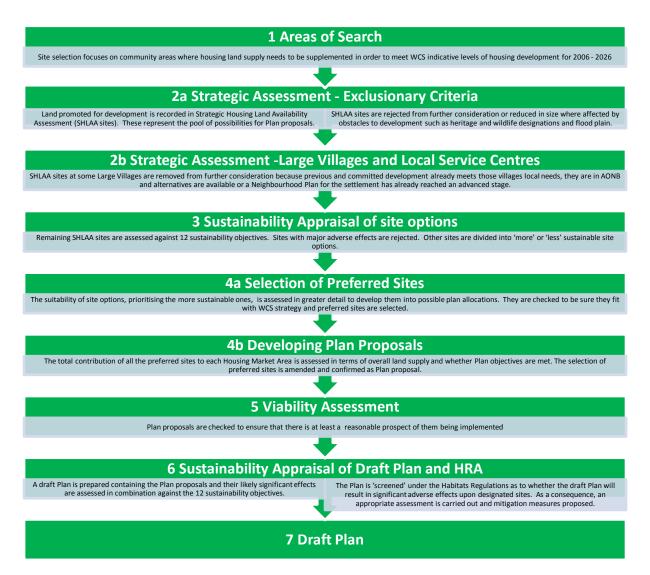


Figure 2: Site Selection Process

Appendix One: Stage 2 Strategic Assessment - 2B: Large villages

Assessment Criteria		Large Villages	
		Bratton	Dilton Marsh
	Number of dwellings in village (2006) ^[1]	819	509
Have local housing needs for the Plan period	Housing completions (2006 – 2016) ^[2]	20	21
already been met?	Developable commitments (2016 – 2026)	6	1
	Proportionate growth of village (2006 – 2026)	3.2%	4.3%

^{[1] 2011} census data (minus housing completions 2011-2016)
[2] Note: Completions and commitments may not add up to the total for the Area of Search, as the total also includes housing development outside of the Large Villages e.g. at Small Villages and open countryside.

Assessment Criteria	Large Villages		
Assessment Ontena	Bratton	Dilton Marsh	
Have local housing needs already been considered by a sufficiently advanced neighbourhood plan?	No. There is no Neighbourhood Plan under preparation. In 2013, a Housing Needs Survey identified, until 2015, a need for Subsidised rented housing: Subsidised rented housing 11 2x one bedroom homes 1x two bedroom homes 2x three bedroom homes Shared / Low cost home ownership 2x two bedroom homes 1x four bedroom home	No. There is no Neighbourhood Plan under preparation. No RHNS available.	
Are there any potential environmental constraints (e.g. strategic environmental/landscape designations and heritage assets)?	Bratton does not fall within any Area of Outstanding Natural Beauty designations, but is covered by a Special Landscape Area designation which would need to be a consideration in any future developments at the village. A large part of the village is also designated within a conservation area, and there are a number of ecology designations in the village hinterland.	Dilton Marsh is relatively unconstrained. There are County Wildlife Sites to the south and west, connected to the village.	
Are there any known strategic infrastructure constraints (e.g. education, transport and utilities)?	Primary school provision This school has a large number of surplus places and would benefit from housing within the catchment area. Secondary school provision Matravers currently has some surplus places but these are expected to fill over	Primary school provision There is a primary school in the village, although the school is full and forecast to remain so, and cannot be expanded. There are also pressures on primary education capacity in Westbury, and Dilton Marsh Primary School accommodates pupils coming in from Westbury. Further	

Assessment Criteria		Large Villages	
Assessine		Bratton	Dilton Marsh
		the next few years as housing already approved is built plus larger cohorts will begin to feed through from the primary schools. The school could be expanded when necessary. Transport A regular bus service exists connecting the village with Westbury and	development at Dilton Marsh is likely to cause an issue with primary education capacity in the area, and housing allocations should not be considered in this village until the wider primary education capacity has been addressed. Secondary school provision Matravers currently has some surplus places
		Trowbridge.	but these are expected to fill over the next few years as housing already approved is built plus larger cohorts will begin to feed through from the primary schools. The school could be expanded when necessary.
			Transport A regular bus service exists connecting the village with Westbury and Trowbridge.
How did the parish council respond to previous consultations on the Wiltshire Housing Sites Allocations Plan?		Bratton Parish Council have advised Wiltshire Council that SHLAA site 321 is a site with potential for building in the future bearing in mind it is in the Salisbury Plain Special Landscape Area and, as it is at the West entrance to the village, any development should be designed to present an attractive aspect both in terms of landscape and architecture to this approach.	The Parish Council did not respond to recent consultation on the Housing Site Allocations DPD.
Sites submitted to the Strategic	How many sites were submitted to	3 sites SHLAA sites 321, 738, 3527	6 sites SHLAA sites 175, 1008, 1009, 1038, 1043, 3270

Assessment Criteria		Large Villages	
		Bratton	Dilton Marsh
Housing Land	the SHLAA?		
Availability Assessment	How many	1 site (32 dwellings)	1 site (335 dwellings)
	SHLAA sites do not meet the Stage 2a strategic constraints and could be taken forward for more detailed assessment (total remaining capacity 18)?	SHLAA site 321	SHLAA site 3270
Summary and conclusions	Taking the above into account, is there any justification for removing the Large Village from further consideration in the site selection process?	Bratton does not fall within any Area of Outstanding Natural Beauty designations, but is covered by a Special Landscape Area designation which would need to be a consideration in any future developments at the village. A large part of the village is also designated within a conservation area, and there are a number of ecology designations in the village hinterland. The village contains a number of facilities and services, including a primary school (with capacity), a shop/post office, places of worship, café, public house, halls,	Dilton Marsh is not within an Area of Outstanding Natural Beauty or other landscape designation. There are a number of ecology designations in the village hinterland. The village contains a number of facilities and services, shop, post office, place of worship, public house, recreational playing field. The village also benefits from a train station. There is a primary school in the village, although the school is full and forecast to remain so, and cannot be expanded. There are also pressures on primary education capacity in Westbury which impacts school capacity at Dilton

¹⁸ See Appendix 4 to this paper for the full assessment of SHLAA sites at Stage 2a of the site selection process.

Assessment Criteria		Large Villages	
		Bratton	Dilton Marsh
		recreation ground, and GP surgery. There are not considered to be any overriding constraints which would result in exclusion of sites at this village at this stage.	Marsh. Further development at Dilton Marsh is likely to cause an issue with primary education capacity in the area, and housing allocations should not be considered in this village until the wider primary education capacity has been addressed.
	Conclusion:	TAKE FORWARD	REMOVE

Appendix Two: Stage 4a: Selection of Preferred Sites - Detailed Methodology

Work to this point has considered 'SHLAA sites'. The purpose of this stage, which involves 5 Steps, is to select those 'SHLAA sites' that can be site allocations and produce a detailed site boundary and text for each one's inclusion in the draft Plan. The starting point is that all the 'more sustainable sites' resulting from the assessment in stage 3 are capable of becoming site allocations.

For inclusion in the Plan, a site should demonstrate that it has 'net sustainability benefits': that likely adverse effects, after taking account of mitigation measures, are outweighed by likely positive effects, once measures to maximise those benefits have also been considered. However further work may show that adverse effects actually outweigh the positive ones, or be too marginal, in which case they should be rejected.

The Sustainability Appraisal (SA) identifies likely adverse and positive effects. Stage 4a involves further work assessing only the site-specific effects (i.e. effects that are not common to most other sites) to clarify how they may be successfully mitigated or maximised. This work provides a more detailed understanding of the site, including exact boundaries and a more accurate estimate of a site's dwelling capacity. The work also involves specialist input from others, such as for landscape and heritage sustainability objectives. It also judges the overall suitability of a site looking at effects and measures in combination, for example costly mitigation measures may reduce the scope for a development to provide a policy compliant level of affordable housing. This needs to be noted. Altogether, site suitability is considered at Step 1.

A site should also fit with each area strategy contained in the Core Strategy. Some proposals may help to address issues identified in the Core Strategy but others may not. (Step 2 assesses this aspect) A 'SHLAA site' at a large village should also be consistent with Core Policy 1 of the Core Strategy. It should represent modest growth and help to support local jobs, community infrastructure and housing needs (Step 3 considers this).

Once more is known about how site options perform and how they fit with area strategy then it will be possible to distinguish, if needed, between the better and less well performing sites amongst those considered the 'more sustainable sites' resulting from the Stage 3. (Step 4 summarises Steps 1-3)

But the starting point is that all sites will go forward where there is evidence that they have net benefits, fit broadly with area strategy and are consistent with Core Policy 1. A judgement, however, may need to be made on rejecting one or more sites when:

- the overall scale of development exceeds that proposed by each area strategy.
- if several site options at a large village suggest a scale of development that exceeds 'modest growth' that is not supported by local needs.

If the more sustainable sites do not look like they will provide enough housing, it might be necessary to look again at 'less sustainable sites' identified at Stage 3.

Each remaining site option should have a detailed site boundary and short description of site-specific measures, not common with any other site¹⁹, that are necessary either to mitigate harm or maximise benefits. This text would be capable of transfer to a draft Plan. (This is Step 5).

Stage 4a is carried out in five steps. Steps 1-4 are carried out for each of the 'more sustainable sites' recommended by the Stage 3 SA results. Only in exceptional circumstances should it be necessary for further assessment of 'less sustainable sites' (see above). Step 5 considers the area of search as a whole, selects and justifies the selection of preferred sites and concludes with a set of draft proposals.

Step 1 (1) transforms a SHLAA site into a possible draft proposal by a more detailed assessment of the effects identified in Stage 3; and (2) provides a measure of the net sustainability benefits of each site.

Step 2 assesses how well a site may contribute to the relevant area strategy for the wider community area in terms of how much it might contribute to housing requirements, deliver the vision for the area or address specific local issues.

Step 3 is a specific assessment of whether a site at a large village is consistent with Core Policy 1; that it would constitute modest growth and meet local needs, including local housing needs

Step 4 is a summary conclusion for each site.

Step 5 considers all the sites together and is the selection and rejection of sites. All sites that have satisfied Steps 1-3 would be taken forward. The step compares the total dwellings that are provided by the pool of sites to indicative residual requirements. Where necessary, it selects and justifies site options that need to be rejected because the overall scales of development exceed that proposed by each area strategy.

• if several site options at a large village suggest too much development then a site may need to be rejected.

The conclusion gives an individual justification for a site being rejected. Generally, it should be the site option(s) that performs the least well using evidence from Step 4.

Steps 1-5 are recorded in each community area paper using the following templates and cue or decision aiding questions.

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¹⁹ Each Community Area Topic Paper, Stage 4a Introduction lists generic mitigation measures that can generally be assumed to be common to all sites.

STEP 1 – POTENTAL SITE SUITABILITY

Criteria	DAQ
Can site-specific adverse effects be mitigated? If so how?	 Identify each site-specific adverse effect in the SA Describe the measures and how these mitigate the effects Are there measures essential to allow development to proceed If so describe how these measures are referred to in the Plan text (1-2 sentences) Do they affect the capacity of the site? Do they change the boundary to the site
	Consult as appropriate with the relevant consultee associated with each SA objective
How well site- specific positive effect be realised?	The converse to the above. Opportunities should be explored, with relevant consultees if necessary, to maximise benefits whilst ensuring that they are necessary, directly-related and proportionate to the proposal.
How accessible is the site?	A summary description of how vehicle access can be achieved, how easily and if development would create congestion or safety problems?
	A description of how well the site is located in relation to local services and employment in terms of access by alternatives to the private car.
Overall suitability	An overall conclusion as to whether mitigation measures are reasonable and achievable.
	Site capacity is stated taking account of mitigation measures and this is used as the basis of assessment for steps 2-5.
	No potential sites are rejected at this stage. Most sites will however 'go forward' to selection, given the SA conclusion. However, it would need to be noted that a 'moderate adverse effect' that cannot be fully mitigated will need substantial benefits to outweigh it in order for such a site to be allocated.
	Where there is more than one site at a settlement, it is important that this section highlights each one's particular strengths and weaknesses.

STEP 2 – POTENTAL SITE FIT WITH AREA STRATEGY

Answers are not expected to be in depth. It is important to note where site options conflict or undermine aspects of the strategy or may have a specific consequence particular to that site. These are the two main aspects that will influence whether or not a site is selected.

Criteria	DAQ
Scale of development v requirement	What % of the residual indicative dwelling requirement ²⁰ does the site deliver.
Fit with area vision	How well does the site promote the vision for the area (WCS: 'How will the ?? Community Area change by 2026?)?
Addresses specific issues	How would development of the site address issues identified in the Area Strategy?
	(WCS requires development proposals to demonstrate how these issues and considerations will be addressed.)

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STEP 3: LARGE VILLAGE POTENTIAL SITE FIT WITH CORE POLICY 1

For context also refer to the stage 2 work that has already been undertaken on large villages suitability. Appendix 6 has the methodology used at stage 2 and there are completed templates for each community area remainder. (These are also summarised in topic papers). Answers are needed for all DAQ questions.

Criteria	DAQ
Needs can be met at the local primary school	Is there capacity in the local primary school(s)?
Modest scale of development	Proportionate increase in the total size of a settlement and
3070.0p.110.11	Continuity with past rates of development
Meeting Local Housing Needs	Is there evidence to show that a Neighbourhood Plan (NP) will address local housing needs or that there will not be an NP?
	Could Local Housing Needs be met by an exception scheme under policy CP44

STEP 4: SITE SUMMARY

Conclusion and summary of steps 1-3

Overall conclusion to the above narrative: indicating the form, extent and certainty of net benefits, stating whether or not the site conforms to Core Policy 1 (for a rural settlement) and how central a proposal may (or may not be), individually or in combination, to achieving the area vision set in the core strategy and in addressing any identified key issues (particularly for towns and principal settlements)

Summary should include an overall statement of sustainability net benefit, using the following as a guide

Overall sustainability	Criteria	Justification
Marginal	A significant negative adverse effect results from more detailed assessment because	It is not certain that a site is developable (possibly insurmountable infrastructure obstacle (e.gl. not physically possible to enlarge local primary school), no realistic safe vehicle access, significant new constraint) It is not certain that positive effects will outweigh negative ones (e.g. site will be
Minor	There are several minor adverse effects all straight forward to mitigate but benefits are limited because	subject to HRA appropriate assessment) the scope for affordable housing is limited constraints severely limit the proportion of development acceptable on the site development adds to pressures on local
Moderate	Adverse effects are minor and will be resolved by straightforward mitigation and	infrastructure except for CIL contributionsthere is scope for affordable housing if necessary, development can help to address local infrastructure capacity issues over and above CIL

Good	Minor adverse effects are clearly outweighed by positive benefits and	there is good scope for affordable housing and there is evidence of need
		development will provide local infrastructure on site, helping to address local infrastructure capacity issues over and above CIL
		scale of development is not limited or dependent upon resolving important constraints
Significant	Development addresses positively a specific issue identified in the area strategy and	minor adverse effects are clearly outweighed by positive benefits
		there is good scope for affordable housing and there is evidence of need
		development will provide local infrastructure on site, helping to address local infrastructure capacity issues over and above CIL
		scale of development is not limited or dependent upon resolving important constraints

Step 5: Community Area/settlements CONCLUSIONS

Step 5 : Community Area	a/settlements CONCLUSIONS
	DAQ
Fit with spatial strategy	Record total dwellings that are provided by the pool of preferred sites v indicative requirements. Do these results fit with the spatial strategy indicative requirements?
	Is it necessary to reduce the number of sites? Is it necessary to include 'less sustainable sites'? If so which ones and why, repeating steps 1-4 above for these sites?
Selection of preferred	Should any potential sites be rejected because adverse effects outweigh the benefits?
sites	 Should any potential sites be removed at a large village in order to comply with CP1 because they exceed 'modest growth' for which there is no local justification Where there is more than one potential site at a village, should one or more sites be removed to fit with Core Policy 1. If so which one(s) and why those?
	Should any potential sites at Market Towns or Principal Settlements be retained in order to provide sufficient housing even though because adverse effects outweigh the benefits?
	Justify the selection of sites based on preferring those remaining sites that produce the most net benefits.
	Preferred sites should fit well with the spatial strategy. Sites at Market Towns and Principal Settlements will fit with these being the focus for growth. Large villages should only accept modest growth to meet local needs (as assessed for each site at step 3 and as above).

Summarise the local justification for greater scales of development than modest growth at a Large Village.

The role of a site at a Local Service Centre will also need to be recognised.