

APPENDIX 2

Wiltshire Local Plan Review

Malmesbury – 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 Malmesbury – 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 Malmesbury the requirement emerging is for an additional 665 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 Malmesbury Neighbourhood Plan. Taking account of this amount approximately 95 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

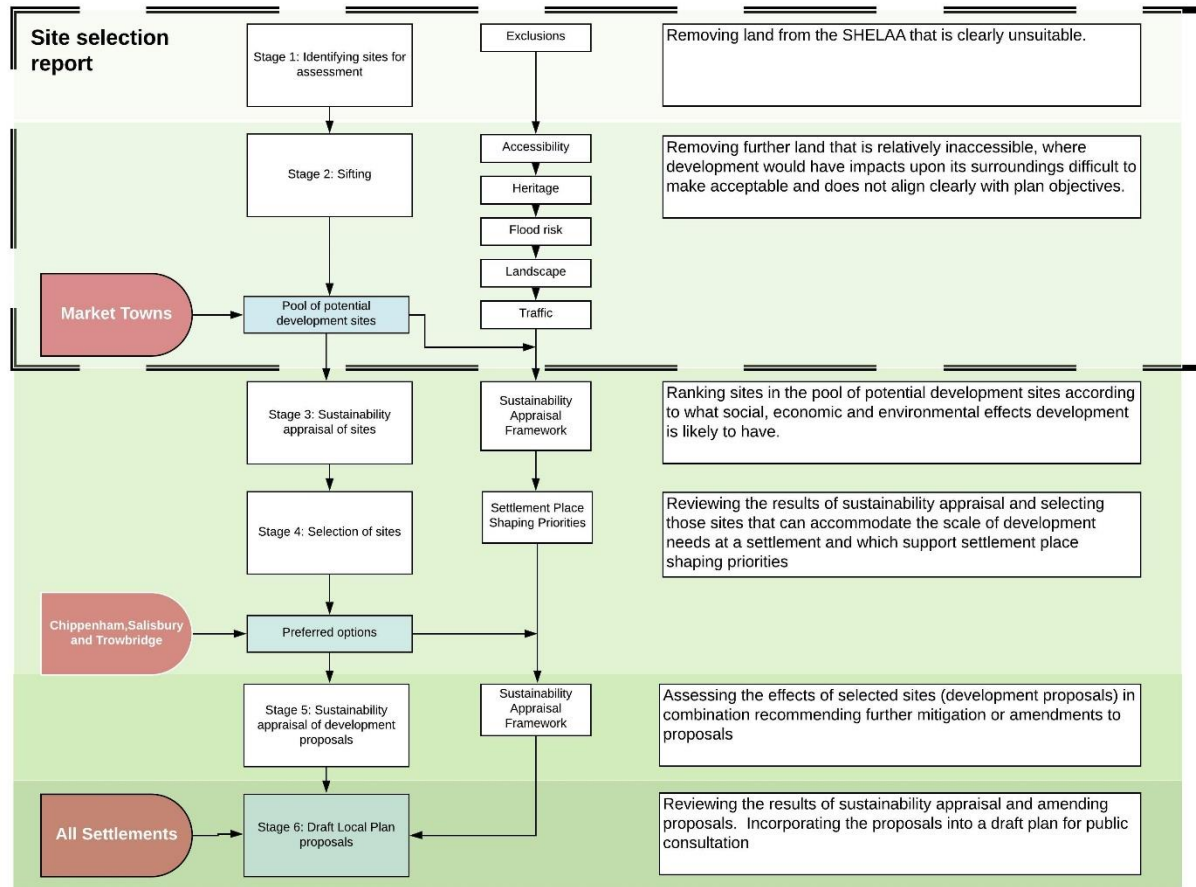


Figure 1 Site Selection Process

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 place shaping priorities for a settlement. 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 stages 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 Assessments

24. This stage starts with all SHELAA land parcels on greenfield land at the edge of Malmesbury 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 that only one site has been excluded as the landowner has withdrawn this site.

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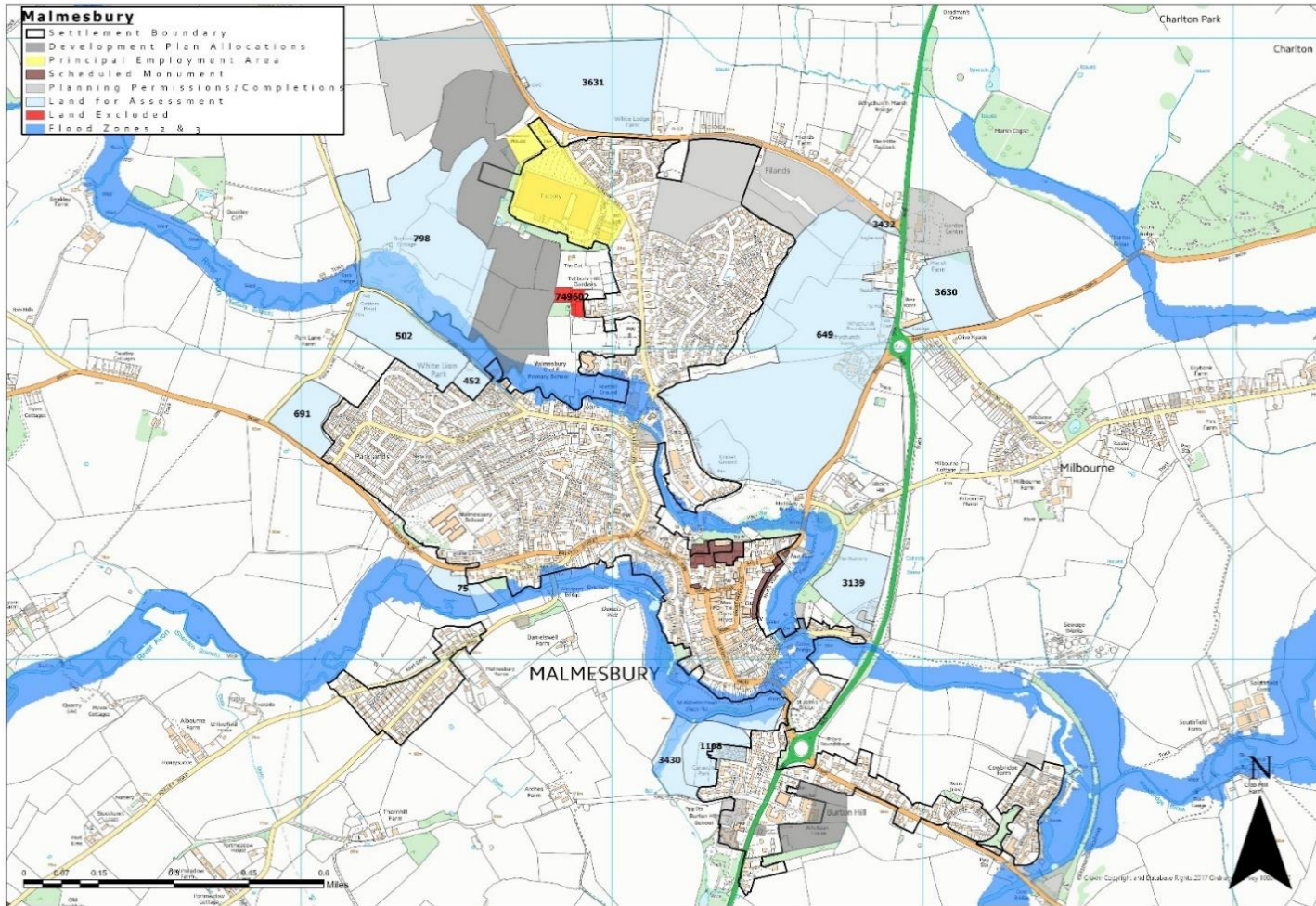


Figure 2 Map showing stage 1 SHELAA land excluded

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 Malmesbury is shown in the table below:

Malmesbury Strategic Context

Context criteria	Detail
Long-term pattern of development	<p>From the hilltop core at the confluence of the Tetbury Avon and the River Avon, the town has grown eastward between the course of these two rivers. It then subsequently expanded northward to the parts less environmentally constrained. Burton Hill has been the exception, over the river on the southern approach to the town.</p>
Significant environmental factors	<p>The hilltop defensive character of the settlement is a significant and distinctive characteristic of the town. Broad areas where future growth is most constrained, to retain this feature, are around the southern end of the urban area.</p> <p>The Cotswold Area of Outstanding Natural Beauty fringes the town broadly to the west.</p> <p>There are areas of flood risk associated with each river.</p> <p>The lines of the B4040 and B4014 appear broadly to limit the spread of the current urban area. Development beyond them meets rising land and any significant development would represent a departure and possible precedent.</p> <p>The busier A429 skirts the town more loosely on its eastern extent. It is less clearly in a role like the other minor roads.</p>
Scale of growth and place shaping priorities	<p>The scale of growth is relatively modest and the vast majority is already in the pipeline.</p> <p>Strategic priorities include the overriding importance of retaining the character and setting to the town and its heritage assets. They involve gearing new housing provision to better meet local needs, retaining a flourishing town centre and improving the spread of local employment opportunities.</p>
Future growth possibilities for the urban area	<p>The likeliest future growth possibilities continue past directions; within the two rivers to the east and north-east, within the line of the A429.</p> <p>The relatively small proportion of additional land needed to meet the scales of growth envisaged at the settlement reduces the need to have a large pool of possible sites from which to choose.</p> <p>There are SHELAA sites being promoted that could continue the past long-term pattern of development. This pattern has reduced conflicts with significant environmental factors.</p> <p>There are SHELAA sites outside the broad extent of the urban area that would set possible precedents when a significant departure from past patterns does not appear necessary because of the relatively modest amount of additional land that appears to be needed.</p> <p>SHELAA sites (502 and 452) adjoin each other and represent an eastern extension of the urban area. It would be logical to consider this area comprehensively, to what extent and for what uses the area may be suitable for development.</p>

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
798	Backbridge Farm	Yellow	Yellow	Green	Red	Green	<p>A portion of this site is allocated for development in the neighbourhood plan.</p> <p>The further reaches of the site do not have good accessibility and there are flood risks to manage. The area, if developed, would extend the urban area toward the AONB and a main concern is that the site shares inter-visibility with it. The likely scale of development envisaged at the settlement over the plan period would not seem to require this step.</p> <p>The land is also visually very sensitive bounding the River Avon green corridor with open views up and down the valley.</p> <p>With these factors in mind, but particularly that further development would be likely to harm the landscape setting of the river Avon, the site is rejected from further consideration.</p>	X
649	Whychurch Farm	Yellow	Yellow	Yellow	Yellow	Green	<p>This is a large area. Development of the northern part would extend the existing urban area over an area contained within the line of the A429, B4040 and B4014.</p>	✓

SHELLAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic		Taken Forward
							<p>Stage 2A and Stage 2B - Overall judgement</p> <p>Development of the whole site would potentially have a set of significant effects upon the character of the town as whole. Although there are notable issues in the southern portion of the site, these may not be insurmountable or rule out the whole area.</p> <p>It would be appropriate to combine this site with 3432 to consider one logical extension continuing the past pattern of growth, although the scale of development envisaged over the plan period would not seem to warrant the entire site area. Although a modest level of further growth would not require the whole site, if a smaller part is being considered, it would be sensible to take account of longer term implications and possibly the area's longer term treatment.</p> <p>Take forward for further assessment as there does not appear to be any overriding significant impacts that justify excluding the site at this stage.</p>	
3430	Land north and west of Malmesbury Static Caravan Park						<p>Both this and the neighbouring parcel of land (1108) present flood risk and heritage complexities. This parcel however involves particularly difficult landscape impacts that preclude the site as a reasonable alternative.</p> <p>The site is bounded by the sensitive St Aldhelm Mead Park river corridor with open views from pathways onto this land. Development here would have a major impact on the visual amenity of this park from that of a predominantly open rural character to a more enclosed linear green corridor between the two urban areas of Malmesbury and Burton Hill. This is a main factor to remove the land from further consideration.</p> <p>To some degree too, development of this land would also worsen the threat of coalescence with Burton Hill, but the size of the site does not mean this is a significant departure from the existing pattern of development.</p>	X

SHELLAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B - Overall judgement	Taken Forward
1108	Malmesbury Static Caravan and Camp Site	Green	Yellow	Yellow	Yellow	Green	<p>The site is raised slightly higher away from the St Aldhelm Mead Park and there may be potential views of the distinctive skyline of Malmesbury and its abbey although this would need to be checked in any subsequent field survey work.</p> <p>This particular parcel has difficult landscape impacts but it is not reasonable to say these will preclude the entire area from accommodating some development, although this might be of a modest scale.</p> <p>Much of this area has been developed. The extent of land available for redevelopment in the plan period needs clarification.</p> <p>Both this and the neighbouring parcel of land (3430) present flood risk and heritage complexities. To some degree too, development of this land would also worsen the threat of coalescence with Burton Hill, but the size of the site does not mean this is a significant departure from the existing pattern of development.</p> <p>Take forward for further assessment as there does not appear to be any overriding significant impacts that justify excluding the site at this stage.</p>	✓
502	Land West of Malmesbury	Yellow	Yellow	Green	Yellow	Green	<p>The area extends the existing built up area, with boundaries defined by local roads. It has a range of constraints that potentially might limit the site's acceptability and capacity for development. It would be appropriate to combine this site with 452 to consider one logical extension continuing the past pattern of growth.</p> <p>Take forward for further assessment as there does not appear to be any overriding significant impacts that justify excluding the site at this stage.</p>	✓
3139	Abbey View Farm	Green	Yellow	Yellow	Yellow	Green	<p>The site lies to the east of the River Avon and on land within the wider setting to the town showing it as a defensive site. It is however well concealed by existing vegetation and it is located to the west of the A429 where the main urban area is. There are several complexities to potentially negotiate but individually or together do not suggest that this is site should be rejected at this stage.</p>	✓

SHELLAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B - Overall judgement	Taken Forward
							Take forward for further assessment as there does not appear to be any overriding significant impacts that justify excluding the site at this stage.	
3630	Land east of the A429/Crudwell Rd, Malmesbury						The site lies east of the A429 and is separated from the main focus of the urban area to the west. Its accessibility to important destinations in the town is below the average of available sites as a result. Existing character is dispersed homes and isolated non-residential uses. A significant scale of development would be a significant change. Most importantly development would represent a coalescence with the hamlet of Milbourne that so far retains its own separate identity. Largely, for this last reason the site is rejected.	✗
3631	Land north of the B4014/Tetbury Road						The site is north of the B4014, south of which is the main urban extent of the town. Its accessibility to important destinations in the town is below the average of available sites as a result. Existing development in the area takes the form of sporadic development along the B4014 without development rising up the slope. Significant development of the site would represent a marked change. This site is very exposed to views from the countryside to the north and east and an urban encroachment into the open countryside and significant harmful landscape impacts. Given its location the site has limited scope for development; a low density or frontage development at best. On this basis the site is rejected.	✗
452	Land At Park Road						<p>The area extends the existing built up area, with boundaries defined by local roads. It has a range of constraints that potentially might limit the site's acceptability and capacity for development. None, individually or together however, appear sufficient to reject the site.</p> <p>It would be appropriate to combine this site with 502 to consider one logical extension continuing the past pattern of growth. Take forward for further assessment as there does not appear to be any overriding significant impacts that justify excluding the site at this stage.</p>	✓

SHELLAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B - Overall judgement	Taken Forward
		Green	Yellow	Green	Yellow	Green	Take forward for further assessment as there does not appear to be any overriding significant impacts that justify excluding the site at this stage.	
691	Land adjacent Park Lane	Yellow	Green	Green	Yellow	Green	<p>The site appears relatively unconstrained in terms of its wider environmental impacts, although below average in terms of accessibility by non-car modes of travel. It appears to be a reasonable alternative.</p> <p>Take forward for further assessment as there does not appear to be any overriding significant impacts that justify excluding the site at this stage.</p>	✓
75	Rear of Bloomfield House Land	Green	Green	Green	Red	Green	<p>The site sits within the AONB and should not be considered for large scale urban development, except in exceptional circumstances. Impact on the attractiveness of the landscape is the central consideration.</p> <p>Development would be further encroachment beyond the B4040. The site is prominent in views toward the AONB and views toward the town. Potential for development would also appear to be against the urban grain, with scope limited to a low density or frontage development at best. On this basis, the site is rejected from further consideration.</p>	✗
3432	Inglenook, Crudwell Road	Yellow	Green	Green	Green	Green	<p>A very small site which would be more appropriately considered alongside the larger site 649. There appear to be no insurmountable complexities in terms of wider impacts that would merit rejecting the site at this stage.</p> <p>It would be appropriate to combine this site with 649 to consider one logical extension continuing the past pattern of growth. Take forward for further assessment as there does not appear to be any overriding significant impacts that justify excluding the site at this stage.</p>	✓

The following sites have been combined:

Ref	Reason
502 and 452	These sites abut each other and have no strong physical barriers. The area extends the existing built up area, within boundaries defined by local roads.
649 and 3432	These sites abut each other and have no strong physical barriers. Development of the northern area would extend the existing urban area over an area contained within the line of the A429, B4040 and B4014.

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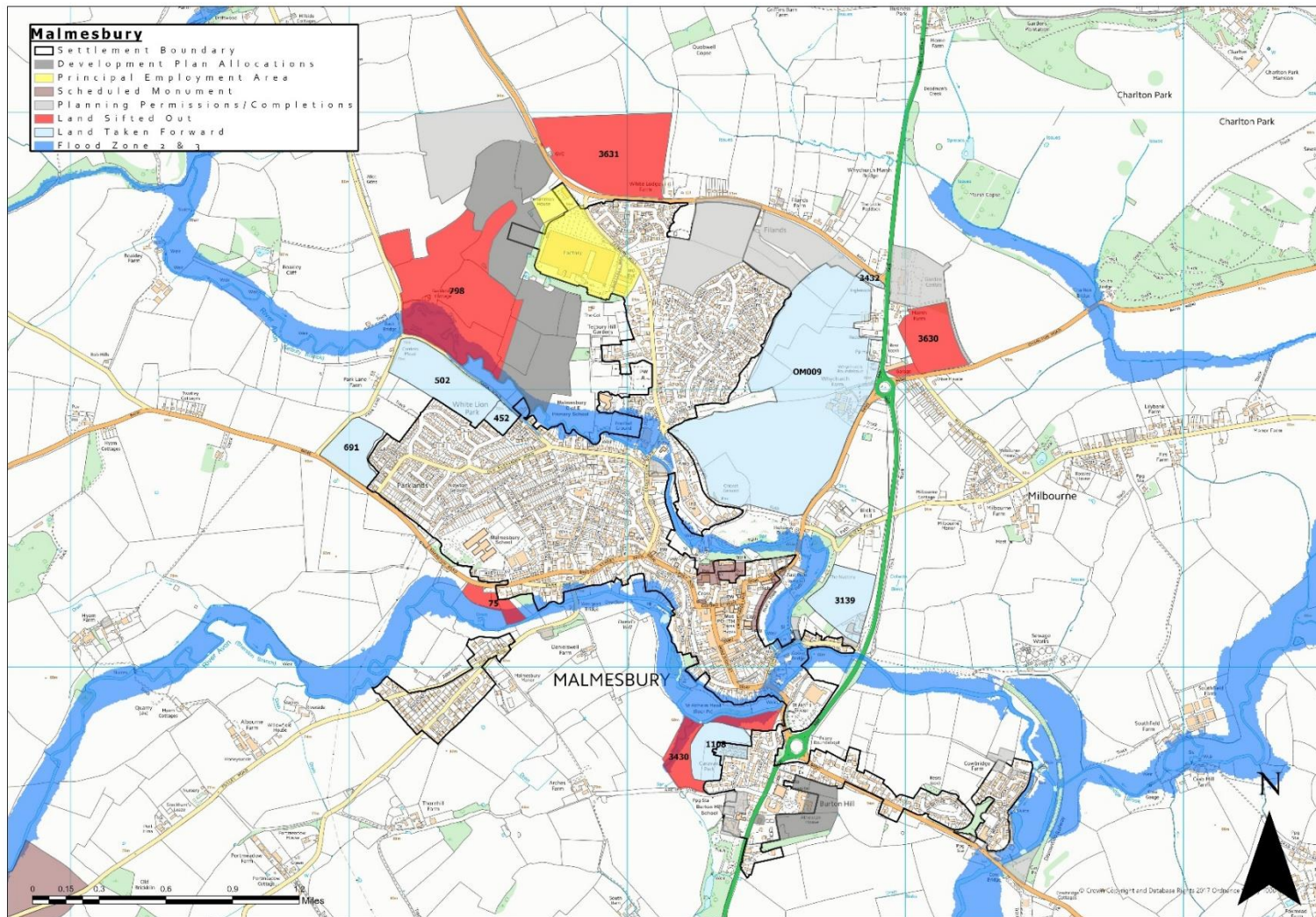


Figure 3 Map showing results of Stage 2 SHELAA land sifting

Conclusion

46. The following map shows the final pool of potential development sites. From these sites may be selected those necessary to meet scales of growth and priorities for the town over the plan period. 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.

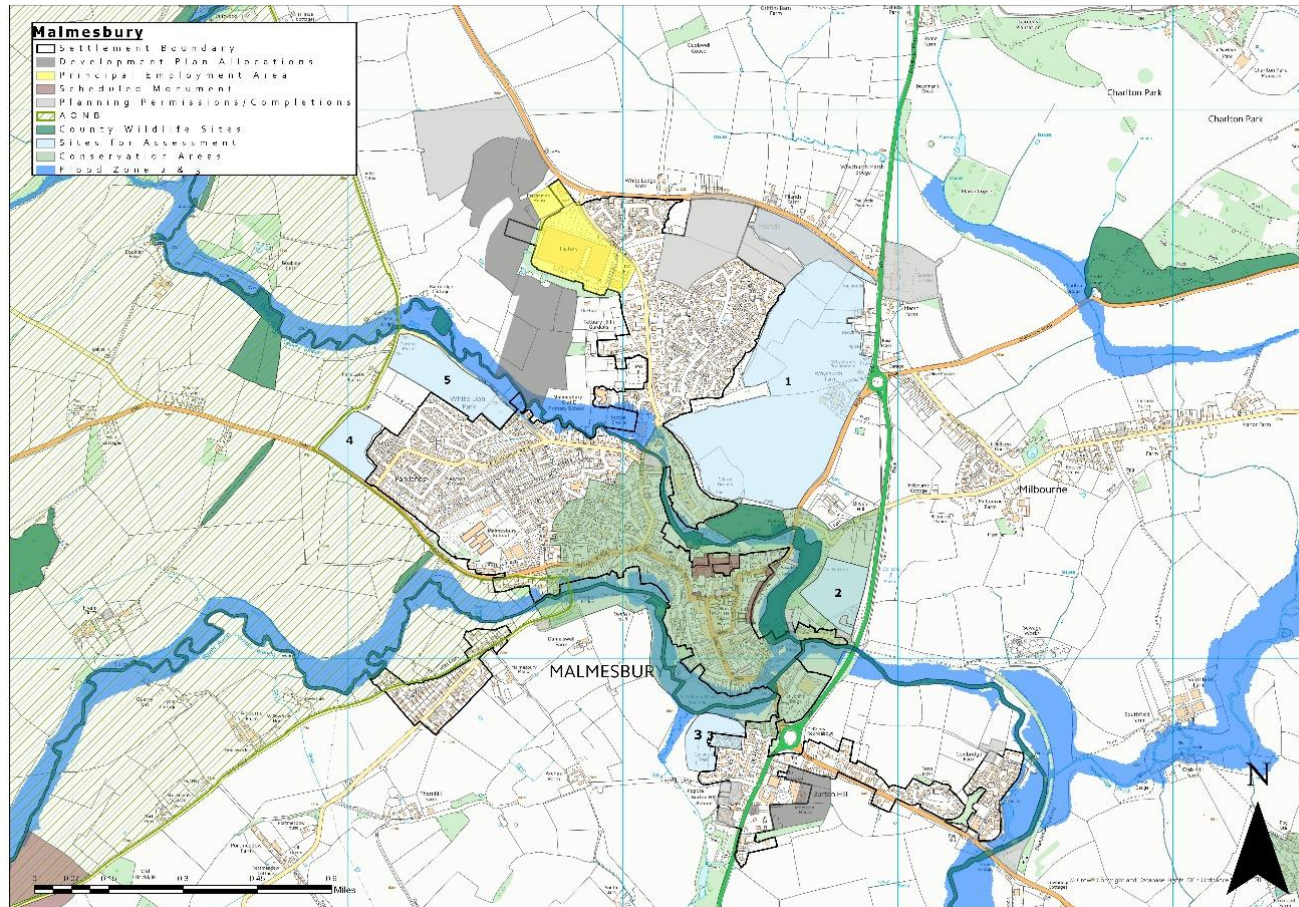


Figure 4 Map showing pool of potential development sites