

Planning For Bradford on Avon

July 2023

1. Introduction

'Planning for Bradford on Avon is a guide as to how the Local Plan Review ('the Plan'), which will replace the Wiltshire Core Strategy, will affect the town over the coming years. It sets out the evidence and processes that have informed the policies of the Plan that relate to Bradford on Avon, as follows:

Policy	Title
57	Bradford On Avon

A table containing the current planning policies for Bradford on Avon, and their status, is included at Appendix 1.

The plan sets out what local priorities will shape development and future growth in Bradford on Avon ('place shaping priorities'). They include taking opportunities to improve the town for the local community and protect important assets. The Plan also sets a scale of growth, as part of a wider spatial strategy for Wiltshire, by which the town will expand over the plan period (2020-2038). This is expressed in additional homes and land for new businesses. It then identifies land to be built on, not just for new homes and business, but also for supporting infrastructure.

This document explains the context and rationale for these decisions. It summarises what significant change has taken place recently, what protections and constraints upon growth will continue and what is already set to take place. Local priorities need to be seen in this context. Shaping the town's future, to help deliver these priorities, this document explains what role growth will play; why some areas have been earmarked for development and others not; the direction for the town centre; and how the Plan supports the services and facilities the community requires. Altogether, it tells how the Plan moves forward the existing planning framework for the town to meet fresh challenges and additional needs.

This document therefore combines many strands of evidence gathered over the preparation of the Plan. It pulls together the comments and advice received from, amongst others, local residents, landowners, business and service providers who also influenced the Plan content through consultation. All this information is available to read and is referenced so this further detail can also be examined.

2. Bradford on Avon - Context and challenges

Population	10,400 ¹	13th largest of the County's 16 main settlements
Strategic role	Market Town	Potential for significant development to help sustain, and where necessary, enhance their services and facilities, promoting better levels of self-containment and viable sustainable communities.

Environment

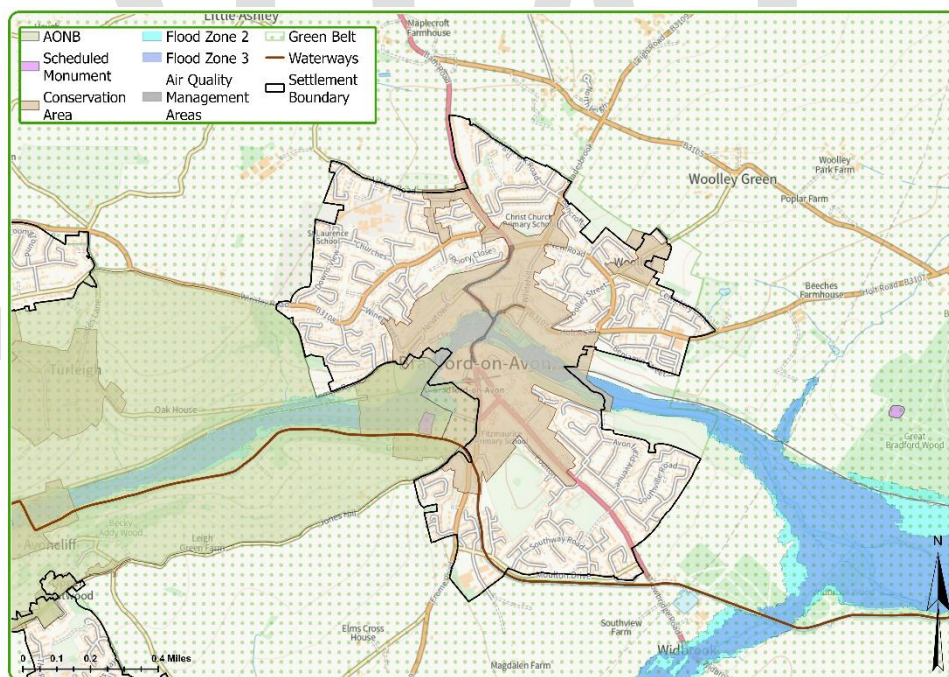


Figure 1. Environmental constraints and designations in Bradford-on-Avon

The town is surrounded by greenbelt, the designated Western Wiltshire Green Belt, the aim of which is to keep open in character and to prevent urban sprawl. Parts of the town to the west are within the Cotswolds Area of Outstanding Natural Beauty (AONB) and within close proximity to the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). As such,

¹ [Census 2021, ONS](https://www.ons.gov.uk)

any expansion of the settlement must conserve the landscape and scenic beauty and give protection to bats species.

The River Avon flows through the centre of the town, alongside the Kennet and Avon Canal and is a popular tourist destination.

Bradford on Avon has one of the most attractive town centres in Wiltshire, situated on both banks of the River Avon. The centre retains many buildings from the 16th, 17th, 18th and 19th centuries, a number of which are of national importance and also provide a considerable amount of visual interest and character to the centre. Much of the town centre's core is formed by densely packed historic buildings which accommodate small retail units at ground floor level and are arranged around narrow winding roads. A large part of the town is also covered by conservation area status, indicating its historic core which is an asset to the town and should be maintained and enhanced where possible.

The town currently offers a low range and number of employment opportunities and has a high level of out-commuting.

The A363 is a main traffic artery through the town. There are problems with high traffic volumes and congestion in the town centre and an Air Quality Management Area (AQMA) covers Market Street, Silver Street, Masons Lane and part of St Margaret's Street. There is a local aspiration for improvements to walking and cycling routes.

The town is well connected by public transport. The railway station is located in the southern part of the town centre and has good links to the south coast and the West country. There is a regular bus service that also operates from the town centre.

How has Bradford on Avon developed?

Housing development completed during the Wiltshire Core Strategy (WCS) plan period has met expectations of growth in recent years. There has been the regeneration of the Kingston Mills site in the centre of the town and then two further large developments to the east of the town for both housing and employment.

The following diagram shows how much housing has been delivered in Bradford on Avon from 2006 to 2022.

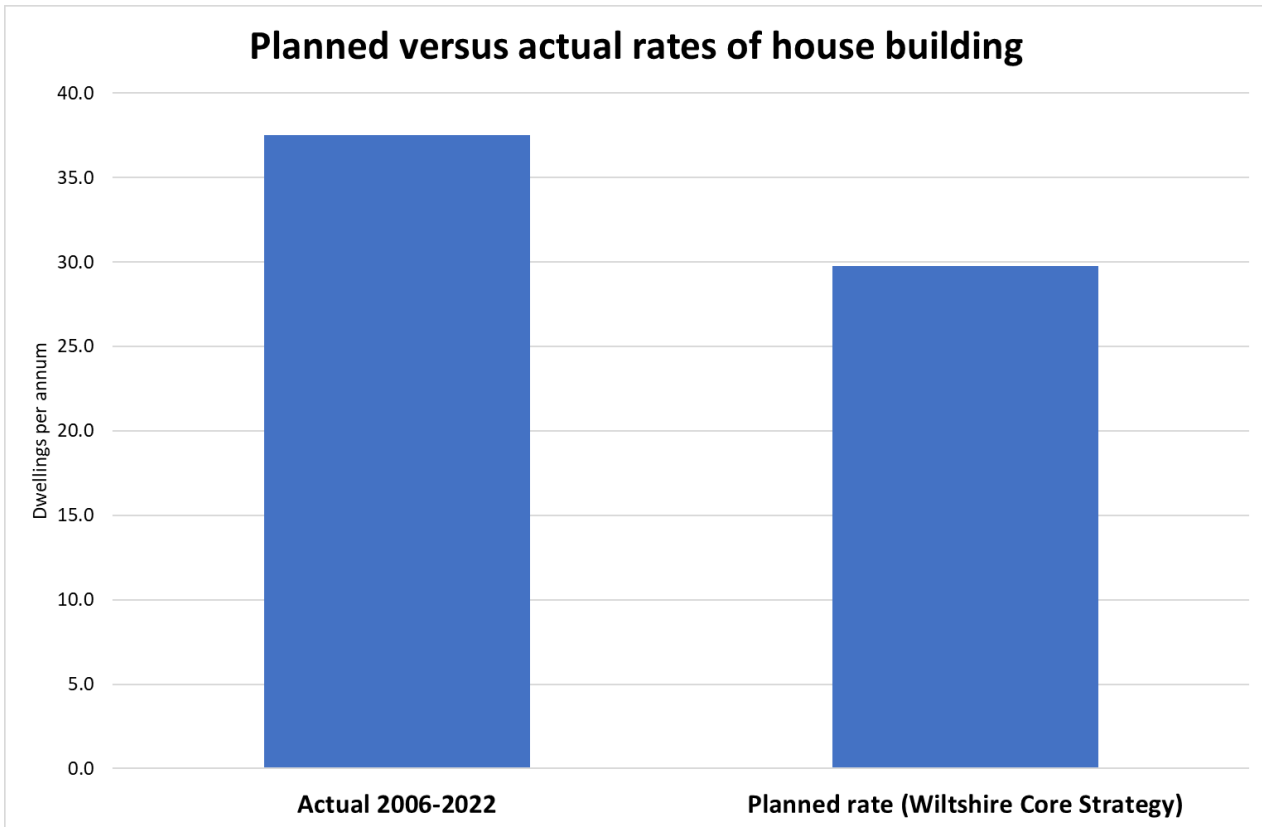


Figure 2. Planned growth versus actual rates of house building in Bradford-on-Avon

Bradford on Avon has grown as anticipated through Core Policy 7 in the WCS. Current policy states that the strategy for Bradford on Avon is to provide growth on a modest/small scale and in order to deliver additional employment, thereby helping to improve the self-containment of the town by providing jobs locally.

The Wholesale & Retail trade sector, including the repair of motor vehicles and motorcycles, and the Manufacturing sector are large employers in the area. Of sectors that influence demand for office space, the Professional, Scientific & Technical sector is the largest, in absolute terms. This sector, alongside the Financial & Insurance sector are the only ones to have seen employment grow over the period analysed. There has been the construction of a new headquarters and production facility for R&D-led automotive business, AB Dynamics, as part of the Kingston Farm mixed-use development, with further new business units following.

There is little evidence for demand for new sites; with demand for 0.4-1.0 ha for offices and 0.1 ha for industrial uses respectively. There are no available sites in Bradford on Avon, but there are sites at both Trowbridge and Westbury that can accommodate forecast growth in this cluster of towns. There is significantly more supply than demand in this area. Some of the demand arising from the rest of the FEMA, outside the settlements, could also be met on these sites.

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The Wiltshire Retail and Town Centres Study (WRTCS)² concludes that, overall, Bradford on Avon is considered to be a healthy town centre. It co-exists alongside nearby centres, such as Trowbridge and Bath and has, over many years, found its own niche, serving both the day to day needs of the local community and also a wider shopping catchment which is attracted to its niche comparison goods / service offer.

Whilst the proportion of vacant retail units in the centre should be kept under close observation, the centre benefits from the very attractive built environment and river-side setting, which is a key attractor to the centre. Bradford on Avon is dominated by a large number of local independent niche retailers. There is no identified capacity / need for net additional retail floorspace for the town in the new Local Plan.

The Neighbourhood Plan identifies three key areas of opportunity, two of which are in the town centre. The focus for the improvement of these areas is in the public realm and improving linkages with the surrounding area and, in the case of the station car park, an improved gateway into the town centre.

Maintenance and investment in the built environment across the centre is considered to be good and the continued refurbishment and re-purposing of buildings in the centre continues to maintain and enhance its overall health.

The busiest parts of the town were around St Margaret's Street, Silver Street, Market Street and Bridge Yard. The narrow width of some pavement areas can affect the ease of pedestrian movement in the town centre, although this does not appear to be a particular issue in relation to the attractiveness of the centre for visitors.

The map below illustrates the Wiltshire Core Strategy land use policies, along with significant development sites at the town.

² Wiltshire Retail and Town Centres Study (Avison Young, 2020)

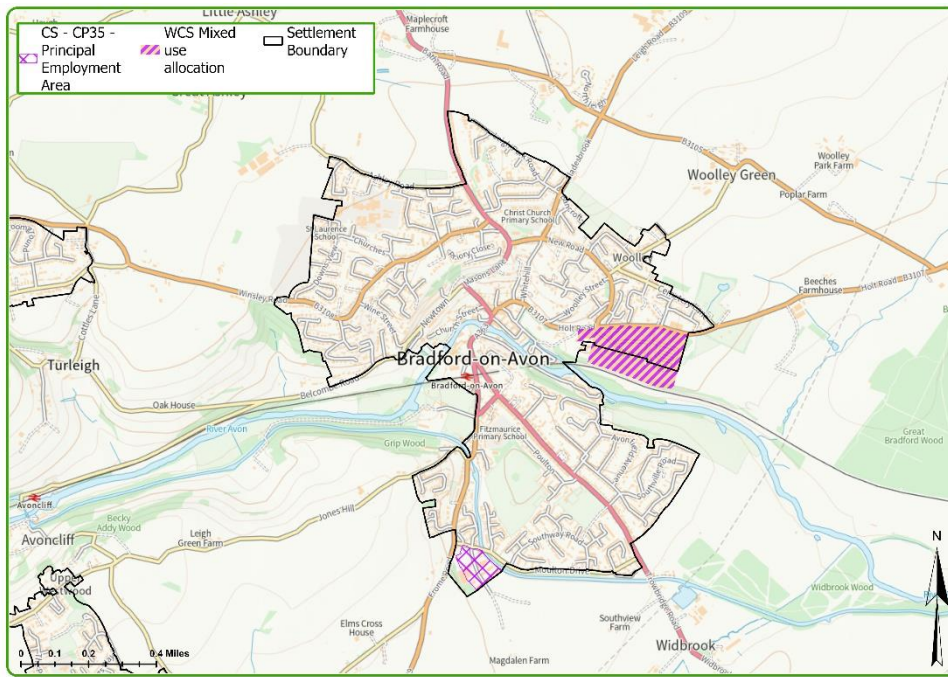


Figure 3. Current development plan allocations in Bradford-on-Avon

Planning to 2038

Looking ahead, against the backdrop of its environmental context, the strategic direction that flows from how Bradford on Avon has developed over recent years is in summary:

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

A set of Place Shaping Priorities (PSPs) address the matters first highlighted in the Wiltshire Core Strategy and new issues that now also need to be tackled as set out above. They result from working with Bradford on Avon Town Council, and wider consultation with the community and other stakeholders, carried out in 2021.

They are as follows:

PLACE SHAPING PRIORITIES

PSP 1 Employment: Delivery of employment growth and retention of all existing employment sites.

PSP 2 Affordable Housing: Provision of affordable housing to help reduce high levels of need in the town.

PSP 3 Air Quality: Improved air quality within the town centre of Bradford on Avon, reducing the impact of traffic, particularly within the Air Quality Management Area.

PSP 4 Historic Environment: Continue to conserve, maintain, and enhance the unique historic architecture and recognise and give proper attention to the landscape character of Bradford on Avon.

PSP 5 Walking and Cycling: Improve the pedestrian and cyclist environment through and around the town.

PSP 6 Design: Achieve high quality design in new buildings and the public realm that respects and responds to its context.

PSP 7 Climate: Addressing the climate emergency and enhancing biodiversity, using multifunctioning techniques such as natural flood controls e.g., flood plains.

PSPs sit alongside the spatial strategy for Bradford on Avon. One of their purposes is to describe what growth intends to help deliver and how change should be managed. They form the basis for an overarching planning policy for Bradford on Avon that guides development and the direction of growth.

PSPs therefore provide a succinct, strategic context, within which to better understand the spatial strategy for the main settlements. They also set a framework to co-ordinate the high level and strategic role of the Local Plan, with the function of neighbourhood plans, prepared by town and parish councils, setting more detailed visions for the future of each community. The two sets of plans therefore work in harness.

PSPs are also used to influence how, and more precisely where, development will take place, as an important part in the selection of sites for new development. Some priorities apply equally everywhere, notably the need to address climate change and achieve carbon reduction. Others are more specific to a particular place. PSPs aim to address unresolved issues that were previously highlighted in the Wiltshire Core Strategy plus new issues that need to be tackled during the next plan period.

Scales of growth at the town, as set out in the Revised Spatial Strategy³, respond to concerns about the loss of greenfield land, coupled with the significant environmental constraints which restrict the availability of land for development.

The new strategy identifies a requirement of 140 homes for the plan period 2020 to 2038. A decrease in rates of house building, compared to the Wiltshire Core Strategy, is justified moving forwards. This requirement should be able to be met through the provision of small

³ Wiltshire Local Plan Review Revised Spatial Strategy (Wiltshire Council, October 2023)

and medium sized sites peppered around the town. Should this not occur a reserve site has been identified.

The Employment Land Review⁴ concludes that there are no available sites in Bradford on Avon, but there are sites at Trowbridge and Westbury that can accommodate forecast growth in this cluster of towns. (comprising 0.4-1.0 ha for offices and 0.4ha for industrial uses).



Figure 4. Wiltshire Core Strategy levels of growth compared with Local Plan Review levels of growth in Bradford-on-Avon

The growth planned for Bradford on Avon will help to support the vitality and viability of the town centre and increase the available mix and tenure of housing within the town. If it can be located as near to the centre as possible this will help to capitalise on growth.

Improvements to footpaths, cycleways and public transport can be provided in conjunction with development. Growth can be guided to ensure continued investment in the town centre. This would accord with PSPs 3 and 5 (above) that seek these outcomes.

The evidence suggests there will not be strong demand to develop additional retail floorspace but to refurbish and re-purpose existing retail instead.

⁴ Wiltshire Employment Land Review, paragraph 6.3.12 (Hardisty Jones Associates, 2023)

3. Local Plan Proposals

Protecting the environment

Bradford on Avon is surrounded by Greenbelt and consideration must also be given to the colonies of bats, relating to the Bath and Bradford on Avon Bat SAC. These present significant environmental constraints to the outward expansion of the town. The Plan recognises, and protects, their importance and any future growth of the settlement must conserve both landscape and scenic beauty and give protection to bats species.

Whilst brownfield development proposals are preferred, unfortunately there are no sites put forward for us to assess. Careful consideration has been given to the potential impacts of any new development on traffic congestion within the town and that these developments are well connected to the town centre, allied with scope for provision for sustainable transport and active travel routes to the town centre and railway station, such as new and improved bus routes and pedestrian and cycling routes.

How many more homes?

From the reduced scale of growth over the plan period (see above) can be deducted homes already built and those already in the pipeline. What is left, and necessary to plan for, is called the residual requirement. When the number of homes built and in the pipeline are deducted, it leaves a further 80 homes to be accommodated at Bradford on Avon up until 2038.

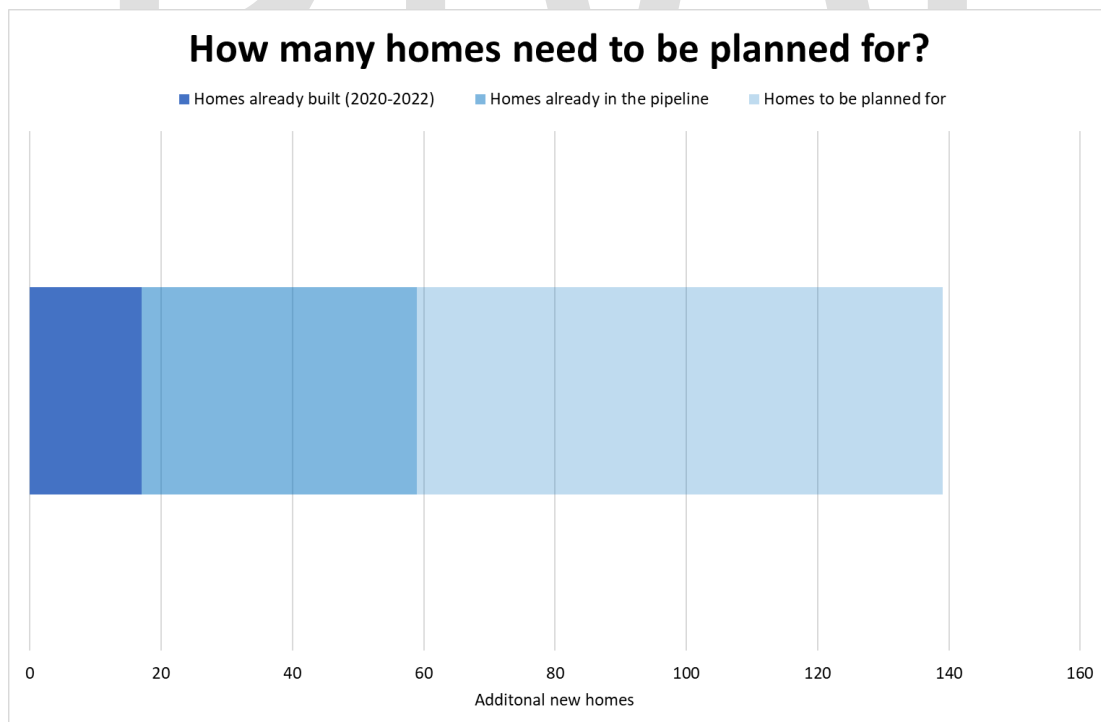


Figure 5. Calculating how many homes need to be planned for in Bradford-on-Avon.

Selecting sites

Two sites were considered reasonable alternatives for new homes and assessed through sustainability appraisal. The map below illustrates the Wiltshire Core Strategy land use policies along with significant development sites at the town.

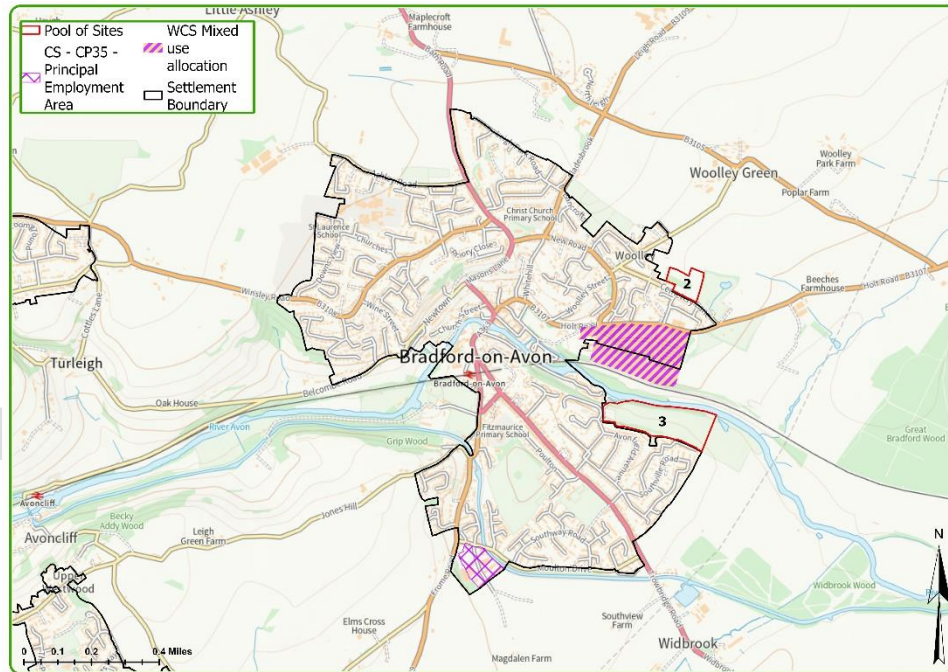


Figure 6. The pool of sites for sustainability appraisal at Bradford-on-Avon

These sites resulted from a two-stage sifting process that removed land incapable of being developed without unacceptable impacts. Sustainability appraisal assesses what likely significant effects development of a site would incur, both positive and negative. Those sites that performed better in sustainability terms were those that were considered likely to have fewer significant adverse environmental effects and greater social and economic benefits.

Sustainability appraisal therefore ranked sites by their social, environmental, and economic effects. The site selection was also informed by how well each site was likely to perform against the settlement's PSPs.

The Sustainability Appraisal showed both these greenfield sites had a range of effects. Site 2, Land North of Holt Road, and North of Cemetery Lane was comparable to Site 3, the Former Golf Club, against most criteria except landscape, where it scored slightly worse.

However, Site 2 was assessed as having a major adverse outcome and that, at development capacity, it would likely render allocation and development of the site unfeasible with regards to bat mitigation. The site is likely to be used for commuting and as a foraging habitat for a range of bat species, including Annex II species. It may also be used by roosting bats. The central and western area of the site is mapped as broadleaved woodland, while hedgerow with broadleaf trees, delineate the eastern boundary of the site and the eastern section of the northern boundary. A long-established broadleaved tree line, with sections of low hedge bank, borders the southern boundary of the site along Cemetery Lane. This would constitute priority habitat that should be retained, with wide buffer/ecological protection zones. These

buffers should remain unilluminated or subject to additional light spill and be retained as 'dark corridors.

Based on this evidence Site 2 was removed from further assessment at Stage 3 of the process. This left Site 3, the Former Golf Club, the only remaining site to be further assessed.

Site 3 performed well against the PSPs due to the site having strengths against three of the PSPs – the provision of affordable housing, protection of the historic architecture of the town and the possible delivery of well-designed homes, especially in relation to climate change and energy efficiency. The site scored neutral against the PSPs relating to employment and improving pedestrian and cycleways. The site is close to the town centre which could allow residents to use active travel and access public transport. However, the main access of the site, would be via Greenland View, with a secondary access to Mythern Meadow, which could increase traffic on Trowbridge Road and therefore any traffic going to Bath would likely go through the AQMA. This is a notable weakness.

The methodology and detailed assessments made in the site selection process are all explained in Appendix 2. The SA process, and its results, are contained within the Wiltshire Local Plan Review Sustainability Appraisal Report (July 2023)⁵

What development is proposed?

The plan recognises that, at some main settlements, the supply of greenfield sites is either severely limited (for example because of green belt designation) or the release of land needs to be managed particularly carefully, minimising its use so as not to harm the overall character and setting of a settlement.

At Bradford on Avon, the main constraint to outward urban expansion is the West Wilts Green Belt. As a result, no allocations are proposed in this plan. Instead, sites of less than 10 dwellings are being relied upon to deliver the 80 dwellings.

Reserve Site

Reserve sites are proposed at main settlements and will only be released for development should, for any reason, other allocations be delayed or the contribution from small sites fail to materialise. A strategic policy of the Plan sets out precisely, in what circumstances and under what conditions, a reserve site may obtain planning permission.

At Bradford on Avon, Site 3 Land at Former Golf Club is identified as a reserve site.

On current evidence, there is only a small need for employment land in Bradford on Avon and, whilst no sites have been identified currently, there is a surplus number of sites that may accommodate the need within the locality of Trowbridge and Westbury.

Neighbourhood planning lends itself to identifying small to medium sized sites for housing and other forms of development. Smaller sites in the neighbourhood plan will supplement

⁵ Wiltshire Local Plan Review Sustainability Appraisal Report (July 2023)

proposals of the Local Plan Review. Currently the Town Council are looking at whether to review the adopted Neighbourhood Plan for Bradford on Avon.

Supporting the Town Centre

The Local Plan contains a framework that describes how all the different uses, found in the central area, function together. It provides context and certainty to business and services. It indicates how the area will operate over the plan period.

The Plan defines a hierarchy of town centres and the extent of town centres and primary shopping areas. The town centre hierarchy is largely consistent with the settlement hierarchy set out in Policy 68 Managing Town Centres. The role of each centre correlates to the role of the wider settlement within the settlement hierarchy. The town centre hierarchy defines Town Centres Boundaries and Primary Shopping Areas within Principal Settlement, Market Towns and Local Service Centres. Within this hierarchy, Principal Settlements provide strategic centres; Market Towns are large shopping and service focused centres with smaller catchments; and Local Service Centres provide a range of shops and services for the local population, thus serving a village centre function.

The Town Centre Boundaries and Primary Shopping Area Boundaries were identified in the 2015 Retail Review. The 2020 Wiltshire Retail and Town Study reviewed these boundaries and found them to be up to date.

Bradford on Avon is defined as a Market Town in the town centre hierarchy. The town centre boundary and primary shopping area can be found on the policy map.

Bradford on Avon town centre has an attractive and rich historic character. There is a strong independent market which serves locals. The unique offer, in combination with the charming environment, are key draws for tourists. The current assortment of frontages is an important aspect of the town centre's character and should be maintained over the plan period. The main vehicular through route is positioned within the town centre and is associated with air quality issues. Nonetheless, the central area boasts quite good public transport links and active travel routes.

The Retail and Town Centres Study indicates a sufficient supply of retail floor space. Whilst there are limited opportunities for retail floorspace growth, there is a need to maintain the independent niche element and the strong range of provision. The very good health of the town centre should, as far as possible, be protected and supported over the period to 2036 and will form a key consideration for any proposals for new food stores. There could be potential to grow the food and beverage market over the plan period.

There are limited opportunities for growth and regeneration of the town centre. Opportunities for enhancement are apparent in other forms, such as through growth of tourism and enhancements of blue and green infrastructure pathways, such as the Kennet and Avon canal. This could encourage active travel to other towns, such as Trowbridge and Bath, improving the health and wellbeing of the community, whilst potentially improving the

air quality of the town. The implementation of the Bradford on Avon Cycling and Walking Infrastructure Plan will play a key role in supporting measures to reduce car dependency in the town centre.

The Bradford on Avon Neighbourhood Plan identified 'areas of opportunity' within the town centre, including the train station car park. The review of the Bradford on Avon Neighbourhood Plan will consider a detailed framework for this site, and any other small/medium scale site opportunities within the town centre, which could support the long-term health and resilience of the central area.

The Wiltshire Retail and Town Centres Study (WRTCS)⁶ concludes that, overall, Bradford on Avon is considered to be a healthy town centre and based on shopping trends and growth in catchment spending, no allocations for additional retail floorspace are required.

4. How will growth be delivered?

Landowners, business and housebuilders are the main drivers of development over the plan period. Service providers will also come forward with proposals to invest in new facilities that support growth in new homes and local business. The Council, as local planning authority, determines their planning applications in accordance with the Local Plan. It also determines them in accordance with the policies of a Neighbourhood Plan, that serves to guide the shape and form of non-strategic aspects of development, such as developing locally distinctive policies on design.

Role of Neighbourhood planning

The Local Plan sets the overarching context for neighbourhood planning in Wiltshire. Strategic policies of the Local Plan are high level and limited to those necessary to address strategic priorities in Wiltshire. At a local level, communities can play an important role in shaping their areas by producing neighbourhood plans which direct where new development should take place, and how it should look. Neighbourhood plans must be in general conformity with the strategic policies set by the Local Plan but can add further locally specific requirements that reflect the wishes of the local community.

The Local Plan sets out a series of Place Shaping Priorities for Bradford on Avon that have been devised in consultation with Bradford on Avon Town Council. The Place Shaping Priorities set a range of outcomes for the town over the lifetime of the Local Plan to 2038. The Place Shaping Priorities also provide a context that can influence the direction of neighbourhood plans.

In order to assist in the production of neighbourhood plans, Wiltshire Council is also required to provide a scale of housing to plan for, for each one. Sites allocated through neighbourhood plans contribute towards meeting the overall of scale of growth set by the

⁶ Wiltshire Retail and Town Centres Study (Avison Young, 2020)

Local Plan, as well as meeting local needs identified through the evidence gathering process for the neighbourhood plan. An element of the Local Plan strategy is therefore to be delivered by neighbourhood plans.

To set an appropriate scale of growth to be planned for through neighbourhood plans at the main settlements (Principal Settlements and Market Towns), a range of factors have been considered:

- Neighbourhood planning lends itself to identifying small to medium sized sites for housing development; and national planning policy sets a target of 10% of overall requirements to be met on sites no larger than a hectare.
- The stage a neighbourhood plan has reached in its preparation, the community's appetite to plan for new homes and its focus all affect the degree to which neighbourhood planning can contribute. The neighbourhood plan can help to meet housing needs in a form that matches local needs.
- The nature and extent of the area designation and what scope there is to identify sites for housing development may be limited, for example, if boundaries are drawn tight to the built-up area and most opportunities will be windfall and difficult to identify.

Currently the Town Council are looking at whether to review the made Neighbourhood Plan for Bradford on Avon. There are likely to be opportunities for the neighbourhood planning process to identify small to medium scale sites to deliver a modest level of growth over the Local Plan period. This could include brownfield sites or land within the built edges of the settlement where potential impacts on the historic environment are likely to be reduced.

There are no other Local Service Centres or Large Villages within the Bradford on Avon neighbourhood area (parish boundary) that have their own separate indicative rural housing requirements⁷. Ten per cent of the scale of growth suggests a baseline requirement of around 15 dwellings.

The neighbourhood area requirement should be considered in combination with other evidence of local needs as determined by the neighbourhood planning group. The neighbourhood area requirement is for the Local Plan period up to 2038, and therefore may be delivered over one or more iterations of a neighbourhood plan within this period.

Bradford on Avon neighbourhood area requirement (2020 to 2038)	15
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Local Infrastructure

The growth of Bradford on Avon needs to be supported by the correct infrastructure, services and facilities. When planning for growth, it is important to consider the

⁷ Neighbourhood area requirements for the rural parishes are calculated separately, as set out within the Rural Housing Requirements Methodology paper.

characteristics of the town in terms of key services and infrastructure (e.g., community facilities, green infrastructure, health, education, transport and utilities), as well as housing need and the local economy. The following summarises the measures required to be put in place to address growth proposals for Bradford on Avon, as well as known infrastructure issues and their timing, what additional provision is necessary to support growth and what other opportunities there may be.

Education

There are currently only a small number of surplus places in the Bradford on Avon primary schools, with limited scope for expansion. St Laurence Academy is at capacity but there is some scope for small scale expansion to meet the demand for up to 300 new homes.

Sustainable transport

The A363 runs through Bradford on Avon and provides a link to Bath (and the M4) to the north via the A4, and to Trowbridge to the south, and thence to the A350 at Yarnbrook. Bradford on Avon is also served by a number of radial B roads: the B3107 connects the town to Melksham and the A350 to the east, the B3109 links the town to Corsham in the north and Frome to the south, and the B3108 links Bradford on Avon to the village of Winsley and the A36 to the west.

The town is relatively well served by bus routes. The D1 service runs frequently between Bath and Warminster via Bradford on Avon, Trowbridge and Westbury with an extension to Salisbury every 2 hours.

Bradford on Avon rail station is well served by the Cardiff to Portsmouth and Bristol to Weymouth services. These provide direct links to Bath, Bristol, Trowbridge and Salisbury.

Current constraints and/or local concerns are:

- The A363 crosses the River Avon on Town Bridge, the only road crossing of the river in the town. The roads in the historic town centre are very narrow and, with a daily traffic flow of 20,000 vehicles, this leads to congestion at peak periods. Three out of five vehicles originate outside the town.
- The high volume of traffic, together with the narrow streets and footways, has resulted in the town centre being dominated by vehicles and having a poor pedestrian environment.
- Due to the high traffic flows, an Air Quality Management Area (AQMA) has been declared in the town centre.
- Peak hour delays on the A363 also affect bus services.
- Rail services do not connect directly to Chippenham or Swindon.
- The historic fabric of Bradford on Avon, its hilly topography, and numerous environmental constraints (River Avon, Kennet and Avon Canal and railway line) restricts pedestrian and cycling connectivity.

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- Facilitating future development growth would increase pressure on the A363 through Bradford on Avon, causing more congestion and potentially exacerbating the existing air quality issues.

Opportunities:

- The A363 through Bradford on Avon is identified in the Department for Transport's Major Road Network (MRN) consultation. The MRN status provides the potential opportunity to secure funding to improve the function of this section of MRN.

Health and social care

There are capacity issues within Bradford on Avon. There is one General Practitioner surgery in Bradford on Avon. The buildings are considered to not be fit for purpose. A new building is required.

Utilities

Electricity infrastructure is constrained across much of Wiltshire. The Grid Supply Points in Wiltshire, located in Minety, Melksham and Mannington are all constrained. The Bulk Supply Points across Wiltshire are also constrained.

With the uptake of low carbon technology and the move towards net zero, there are estimates that energy demand could almost treble by 2050. This increased pressure on the system is something Scottish and Southern Electricity Network (SSEN), as Distribution Systems Operator, is working on to manage new capacity. Solutions may include flexible connections, renewable energy and further investment to reinforce the current infrastructure.

With regard to the foul water network capacity, development at Bradford on Avon may lead to the need for an investment scheme in AMP8. Capacity is likely to be available for a moderate proportion of the residual requirement for Bradford on Avon, beyond which improvements are highly likely to be required. Significant foul water infrastructure may cross sites.

Appendix 1 Policy Context

Strategic policy	Title	RETAINED, REPLACED or DELETED
WCS Core Policy 7	Spatial Strategy for Bradford on Avon Community Area. Principal Employment Areas: Treenwood Industrial Estate and Elm Cross Trading Estate.	Replaced with Policy 57 Bradford-on-Avon
West Wiltshire District Plan Policy R10	Poulton Field, Bradford on Avon	Replaced by Policy 84 Open Space
West Wiltshire District Plan Policy CF9	Bradford on Avon Police Station. The policy safeguards an area of land to the west of the fire station, in Bradford on Avon, for a police station.	DELETE
West Wiltshire District Plan Policy SP1	Town Centre Shopping	Replaced with Policy 68 Managing Town Centres
West Wiltshire District Plan Policy SP4	Primary Retail Frontages	Replaced with Policy 68 Managing Town Centres
West Wiltshire District Plan Policy SP5	Secondary Retail Frontages	Replaced with Policy 68 Managing Town Centres
West Wiltshire District Plan Policy SP6	Local Shopping in Towns and Villages	Replaced with Policy 68 Managing Town Centres

West Wiltshire District Plan Policy TC1	Upper Floor Uses in Town Centres	Replaced with Policy 68 Managing Town Centres
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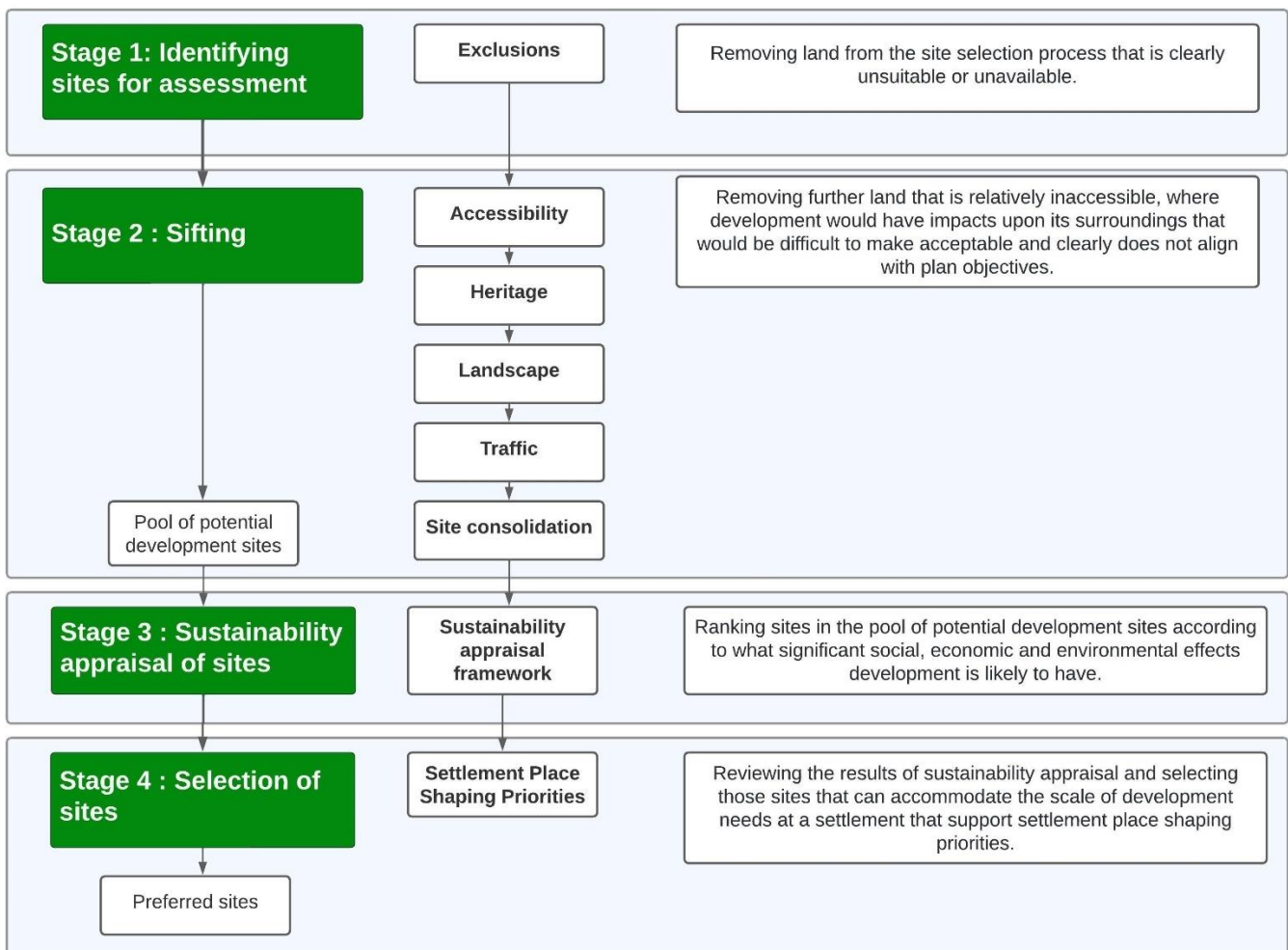
Appendix 2 Site Selection

Site Selection: Bradford on Avon

The purpose of this appendix is to explain the site selection process at Bradford on Avon, which has taken place over a number of stages, as illustrated in the flow diagram below. The full methodology can be found in the supporting Site Selection Methodology report.

This appendix briefly describes the methodology, and explains the outputs that emerge from Stages 1-4, with the concluding stages set out within the main body of this paper.

Summary of the site selection process



Strategic Housing and Employment Land Availability Assessment

The Strategic Housing and Economic Land Availability Assessment⁸ (SHELAA) provides the initial pool of land from which sites may be selected. The SHELAA is a register of land promoted for development by landowners and prospective developers. Parcels of land are submitted to Wiltshire Council for consideration as potential allocations in the Local Plan, as well as Parish and Town Council neighbourhood plans⁹. Plan preparation, and not the SHELAA, determines what land is suitable for development, through a process of selecting the most appropriate sites.

Only sites that were not spatially separated from the built-up edge were considered. The map below shows the SHELAA sites that were considered through the site selection process at Bradford on Avon.

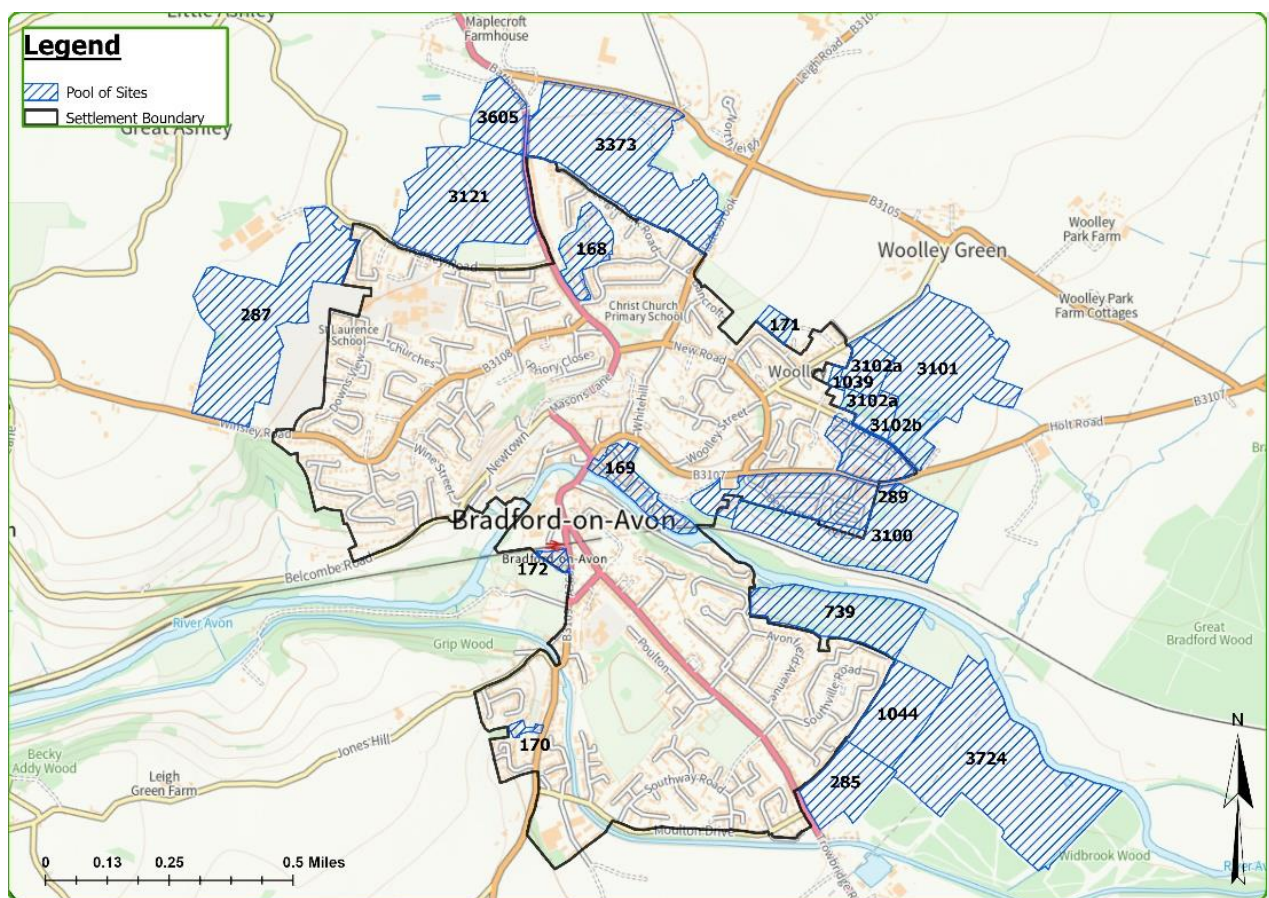


Figure 7. The pool of sites at the stage of the site selection process at Bradford-on-Avon

The following paragraphs summarise the stages of assessment undertaken through the site selection process.

⁸ Information about the [Strategic Housing and Employment Land Availability Assessment](#) can be found on the Council website.

⁹ 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.

Stage 1 – Identifying Sites for Assessment

The initial stage excluded SHELAA sites from further consideration that constituted unsuitable land for development if they were unavailable, separated from the built-edge or clearly unsuitable for development for a range of other reasons, as described within the Site Selection Methodology. While sites at High Post do not adjoin the built edge of a main settlement, the sites were considered to have strategic potential that warranted further testing through the site selection process.

Nine sites at Bradford on Avon were excluded at Stage 1.

Site name	Reason for removal at Stage 1
168	Site built out. Unavailable.
169	Site comprises land already built out for residential and employment. Unavailable
170	Site comprises land already built out for residential. Unavailable
171	Landowner response to January 2021 consultation. Land no longer available.
172	Land no longer available.
285	Land within the Greenbelt. Unavailable.
287	Land within the Greenbelt. Unavailable.
289	Site comprises land already built out for residential and employment. Unavailable.
1044	Land within the Greenbelt. Unavailable.
3100	Land within the Greenbelt. Unavailable.
3101	Land within the Greenbelt. Unavailable.
3121	Land within the Greenbelt. Unavailable.
3373	Land within the Greenbelt. Unavailable.
3605	Land within the Greenbelt. Unavailable.
3724	Land within the Greenbelt. Unavailable.

Stage 2 – Site Sifting

Using the land that passed through Stage 1, a second assessment stage used a limited set of strategic criteria (proportionate evidence¹⁰) to further refine the list of sites to a set of *reasonable alternatives* for further assessment using sustainability appraisal. The

¹⁰ To meet national requirements, plans must be sound, justified by having an appropriate strategy, considering reasonable alternatives, and based on proportionate evidence.

criteria considered at Stage 2 were related to **Accessibility and Wider Impacts** and **Strategic Context** and can be summarised as follows:

- **Accessibility and Wider Impacts**

The merits of each site were assessed to understand strengths and weaknesses in terms of how accessible a site location may be and what wider impacts could result from their development. Sites deemed to be inaccessible, for example, if no reasonable means of access to the site could be secured without third party land, were excluded from further consideration. This is further detailed in the Site Selection Methodology.

In addition to accessibility, the following strategic considerations were tested through Stage 2:

1. **Landscape:** A site that was highly likely to lead to landscape or visual harm, that was unlikely to be possible to be mitigated, was rejected.
2. **Heritage:** A site that contained, or was within the setting of a heritage asset, that was likely to lead to significant and unmitigable harm, was rejected.
3. **Flood Risk:** A site that was wholly within an area at risk from flooding (e.g. in Flood Zones 2 or 3 or other high-risk source of flooding) was rejected.
4. **Traffic:** A site that was likely to lead to an unacceptable degree of harm in terms of traffic and congestion impacts was rejected.

The outcomes from this element of Stage 2 were categorised as high risk of harm (red), medium risk of harm (amber) and low risk of harm (green).

- **Strategic Context**

This part of the Stage 2 assessment considered the pool of sites in relation to the strategic context of the settlement, having regard to:

- Long-term patterns of development
- Significant environmental factors
- Scale of growth and place shaping priorities
- Future growth possibilities for the urban area

The assessment made a judgement on what pool of possible sites constitute a set of reasonable alternatives for further consideration. This does not pre-judge more detailed testing through Sustainability Appraisal but enables sites that are clearly at odds with the strategic context for the settlement, to be ruled out.

Context criteria	Detail
Long-term pattern of development	Historically, Bradford on Avon has developed along the line of the River Avon but has seen limited growth over recent years, with the most notable extensions occurring during the 1960s – 1980s around the southeast and northwest of the town.

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

	<ul style="list-style-type: none"> Addressing the climate emergency and enhancing biodiversity, using multifunctioning techniques such as natural flood controls e.g. floodplains.
Future growth possibilities for the urban area	The Green Belt is a significant constraint to development at Bradford on Avon which, in combination with Local Green Spaces designated in the Bradford on Avon Neighbourhood Plan, means that there are a limited number of realistic options for meeting future housing and employment needs at the town to 2036. Brownfield development is likely to continue to play a key role in meeting the town's housing needs.

Trowbridge HMA: Bradford on Avon Sites Assessment:

Stage 2 assessment conclusions

SHELAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B - Strategic context and overall judgement	Taken Forward
739	Former Golf course	Yellow	Yellow	Green	Green	Yellow	This is the largest site of the remaining options under consideration. Flood Zones 2/3 cover a marginal area towards, the northern edge of the site. The site is, however, also the location of an historic landfill (ref EAHLD09639) and, particularly given the relationship of the site with the adjacent river, there is a potential risk associated with contaminated land and land stability issues. The accessibility criteria for the site scores 'amber' but the assessment of accessibility at this stage is limited to proximity, rather than physical access or route. Achieving suitable physical access for the site is, however, likely to be challenging. The only access would be through the existing housing estate onto the existing junction with Trowbridge Road. It would also mean that westbound traffic would need to travel through the AQMA. Currently insufficient reasons to discount this site against the criteria for this stage. These issues will need to be fully considered in subsequent more detailed assessments.	Green ✓
1039	Land adjacent to Holt Road	Green	Green	Yellow	Red	Yellow	This site is relatively small and lies adjacent to site 3102a. As such, it is subject to the same constraints to development in relation to its physical accessibility (see below commentary on site 3102a). It is, however, unconnected to site 3102a, with the area in between (that falls within	Red X

SHELAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B – Strategic context and overall judgement	Taken Forward
							<p>the original footprint of site 3102a), designated as Local Green Space. The site is a rear garden of an existing house in a Conservation Area. It has large existing trees that provide a setting to the building. Development of this site would affect both the setting of the Conservation Area to the west and the local green space to the north. The Conservation Area Character Assessment notes the importance of views across this open area within the settlement and the importance of scattered fruit trees (remnants of former orchards) in contributing to the historic character of the area. Exclude from further consideration on landscape and heritage grounds.</p>	
3102a	Land North of Holt Road and North of Cemetery Lane						<p>The site is open to the north, with views across the Avon Valley and clay vales. The Wooley Conservation Area is within 100m of the site, to the west, so development of the site could potentially affect its setting. A large area of the site has established tree cover, which may limit the developable area. There may, however, be opportunity to enhance Local Green Space to the north.</p> <p>There is no access to this site via Cemetery Lane, which runs along the southern boundary of the site, because this road will be closed for vehicular access as part of the construction of the 'Bellway' development on site 3102b. It has also been established that access, via Woolley Street, through a Local Green Space covering the north of the site and designated as such in the adopted Neighbourhood Plan, would be unsuitable. This was established through the recent determination of withdrawn and refused planning applications. The site is also sensitive, in landscape terms, and adjacent to the Wooley Conservation Area. Recent decision (19/09366/OUT) refused planning permission for housing development of this site. However, the feasibility of crossing the pedestrianised lane, or the creation of a pedestrian/ cycle overpass to enable the site to gain acceptable access to the highway, will need to be considered at a later stage of assessment. Insufficient reasons to exclude at this stage so carry forward for further assessment.</p>	✓

Of those sites that are taken forward, it was appropriate in some cases to combine sites for the purpose of assessment, where this created more sensible or logical land parcels for further consideration.

In preparation for Stage 3, the remaining sites were relabelled for ease of understanding, as follows:

Site Number	Site Name	SHELAA reference
2	Land North of Holt Road and North of Cemetery Lane	3102a
3	Former Golf course	739

Stage 3 – Sustainability Appraisal

At Stage 3, each of the remaining sites in the pool of sites (reasonable alternatives) was examined through Sustainability Appraisal (SA), by assessing the likely significant effects of potential development under a set of twelve objectives covering social, economic and environmental considerations. A full explanation of the SA methodology is provided in the Wiltshire Local Plan Review Sustainability Appraisal Report (July 2023)¹¹, including the detailed assessments made for each site. [Monitoring and evidence - Wiltshire Council](#)

SA enabled sites to be scored by their respective sustainability benefits and disadvantages. It also identified where it may be possible to mitigate adverse effects, as well as measures which could increase the benefits of development. Stage 3 enabled sites to be ranked in order of most sustainable to least sustainable, based on the SA criteria used.

The table below shows the SA conclusions for the reasonable alternative sites that were assessed. The overall SA score is shown in column 3 of the table.

The SA weights all ‘objectives’ (shown in the top row, below) equally. There are more environmental objectives than others – scores against this type of objective typically tend to be negative. The overall score resulting from the potential development of greenfield sites generally yield a negative value.

Reasonable alternatives are rejected at Stage 3 where the SA concludes that development would result in one or more ‘major adverse effect’ (highlighted in red with a triple negative).

At Bradford on Avon, the SA identified that there were likely major adverse effects arising from the development of Site 2 within the pool of sites due to the impact of

¹¹ The Wiltshire Local Plan Review Sustainability Appraisal Report (July 2023)

protected species. Therefore, only one site was taken forward for further consideration at Bradford on Avon.

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Planning For Bradford on Avon

- Major adverse effect (---) = -3 points (Mitigation unachievable – recommended that site is not considered further)
- Moderate adverse effect (--) = -2 points (Mitigation achievable but problematic)
- Minor adverse effect (-) = -1 point (Mitigation easily achievable)
- Neutral effect (0) = 0 points
- Minor positive effect (+) = +1 point
- Moderate positive effect (++) = +2 points
- Major positive effect (+++) = +3 points

Bradford on Avon: Table showing summary of assessment scores listed in order of site sustainability performance (More ▾ Less)

SITE	Overall site score and position	SA obj 1 (Biodiversity) overall score	SA obj 2 (Land + soil) overall score	SA obj 3 (Water) overall score	SA obj 4 (Air/poll'n) overall score	SA obj 5 (Climate) overall score	SA obj 6 (Energy) overall score	SA obj 7 (Heritage) overall score	SA obj 8 (Landscape) overall score	SA obj 9 (Housing) overall score	SA obj 10 (Inc comms) overall score	SA obj 11 (Transport) overall score	SA obj 12 (Economic) overall score
2	- 11 (=1st)	---	-	--	--	-	0	-	-	+	-	-	+
3	- 11 (=1st)	--	-	--	--	-	0	-	--	+	-	-	+

Stage 4 – Selection of Sites

Stage 4 enabled the results of the SA outcome to be qualitatively examined by consideration of sites in terms of their capability of supporting the Local Plan’s objectives for each community – in particular, the identified ‘Place Shaping Priorities’. Stage 4 also provides discussion and analysis of the scale of growth that would be required to be drawn from the pool of the most sustainable site options, in or to meet the identified housing and employments needs for the settlement.

The SA identifies that Site 2 was likely to result in major adverse effects in respect of ecological impacts. Therefore, this site was removed from further consideration with only one site being taken forward for assessment at Stage 4.

The outcome of Stage 4 refined the results of the Stage 3 SA, by assessing the remaining site against the Place Shaping Priorities.

Broad proposals were then developed for the preferred site, which in this case is identified as a reserve site. Proposed uses were identified, including the infrastructure and mitigation necessary to enable development to proceed.

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Site	SA Rank	PSP1 Employment	PSP2 Affordable Housing	PSP3 Air Quality	PSP4 Historic Architecture	PSP5 Pedestrian and cyclist environment	PSP6 High quality design	PSP6 Climate Change
Site 3	2	Neutral	Strength	Weakness	Strength	Neutral	Strength	Strength
		The site is promoted for residential use only therefore will not deliver employment growth nor take from existing employment space. Unlikely to affect this priority.	Delivery of approximately 200 new homes both market and affordable.	The site is close to the town centre which could allow residents to use active travel and access public transport. However, the main access of the site, would be via Greenland View, with a secondary access to Mythern Meadow, which could increase traffic on Trowbridge Road and therefore any traffic going to Bath would likely go through the AQMA.	The site should not impact upon the historic architecture of the town and could be designed to b in fitting with the town.	The concept plan illustrates the footpaths that run through the site. Although this enables people to use active travel, it doesn't improve upon what already exists, as the priority states.	It would be possible to deliver homes that are designed to a high quality, especially in terms of energy efficiency.	Opportunities for development to consider Bradford on Avon's local climate and environmental emergency pledges.

Planning For Bradford on Avon

The outcome of Stage 4 of the site selection process for Bradford on Avon can be summarised under the 'What development is proposed' section earlier in this paper; concluding that the following site has emerged as a reserve site at Bradford on Avon:

- Land at Former Golf Club

The map below illustrates the outcome of the site selection process (Stages 1-4) at Bradford on Avon.

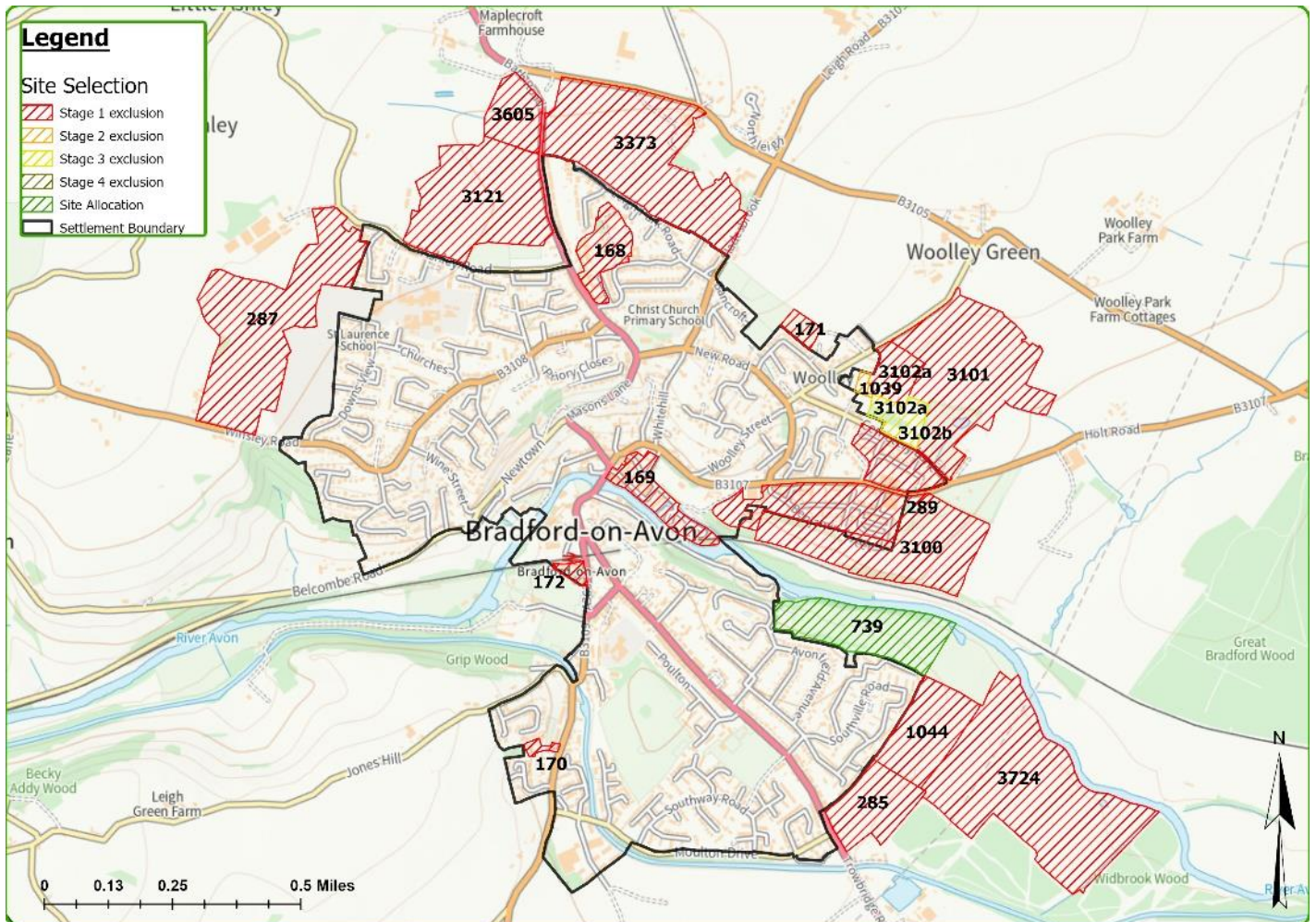


Figure 8. The results of the site selection process at Bradford-on-Avon