



Working towards a core strategy for Wiltshire

Wiltshire Core Strategy

SA Addendum

28 February 2014

Wiltshire Council

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Wiltshire Core Strategy

Sustainability Appraisal Report

Addendum

February 2014

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1. Introduction

- 1.1 This is an addendum to the Sustainability Appraisal (SA) Report¹ that accompanied the Wiltshire Core Strategy Focused Consultation in September 2012, prior to the commencement of the Core Strategy Examination in Public hearing sessions held between May-July 2013. This is the second addendum published for the Core Strategy SA, the first one being an assessment² of modifications made to the Core Strategy following the examination hearing sessions, dated August 2013. This addendum takes into account the information contained within the first addendum document of August 2013 and previous iterations of the SA Report.
- 1.2 On 3rd December 2013, the planning Inspector examining the Core Strategy issued a 10th procedural letter³ to the Council in which he raised a number of issues of concern regarding certain areas of the Core Strategy. These issues include housing requirements, affordable housing provision, gypsy and traveller pitches, Chippenham and the strategic allocations within that community area, settlement boundaries and retail frontages.
- 1.3 Wiltshire Council issued a response⁴ on 19th December 2013 in which it suggested making a number of changes to policies following the completion of further work to respond to the concerns raised by the Inspector. This correspondence and subsequent letters are detailed at www.wiltshire.gov.uk/wiltshirecorestrategyexamination.htm
- 1.4 This addendum document contains an assessment of the sustainability implications of policy changes arising from this recent work in terms of meeting the objective of achieving sustainable development. It does not repeat the discussion of effects and mitigation measures already presented in the main SA Report.

2. Methodology

- 2.1 The methodology for undertaking the Sustainability Appraisal (SA) is described in the SA Report that accompanies the Wiltshire Core Strategy. National guidance⁵ informs this appraisal.
- 2.2 It is important that, where changes are made to the Core Strategy, these are assessed for their sustainability implications. However, only changes that are considered likely to lead to additional significant effects that have not already been highlighted in the SA need be assessed. SEA guidance⁶ states that *'where plans or programmes go through several successive consultation exercises, it is important to keep the implications for the Environmental Report under review to ensure that it remains consistent with the plan or programme on which opinions are being sought. If significant changes are made from the original proposals, the Responsible Authority will need to consider whether a revised Environmental Report is needed'*.

¹ Sustainability Appraisal Report – Focussed Consultation Document (Wiltshire Council, September 2012)

² Sustainability Appraisal Report Addendum (Wiltshire Council, August 2013)

³ Available to view or download at <http://www.wiltshire.gov.uk/wiltshirecorestrategyexamination.htm>

⁴ As per footnote 3.

⁵ <http://www.pas.gov.uk/chapter-6-the-role-of-sustainability-appraisal> and

<https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

⁶ Paragraph 5.D.3, A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005)

2.3 The SA Report has previously predicted and evaluated a wide range of effects for policies and strategic site options within the Core Strategy; where the current proposed modifications to the Core Strategy are not considered likely to lead to additional significant effects, the reasons will be explained in this addendum.

2.4 This addendum will focus on modifications proposed by Wiltshire Council in response to the Core Strategy examination Inspector's concerns raised between December 2013 and February 2014.

3. Assessment of modifications proposed to Wiltshire Core Strategy

3.1 Core Policy 2 – Delivery Strategy

3.1.1 The submitted draft Wiltshire Core Strategy proposed a minimum of 37,000 new dwellings to be delivered over the plan period 2006-2026. The Core Strategy examination Inspector suggested⁷ that housing provision for Wiltshire over the same period should be increased toward the top end of a range which ends at 42,100 homes. Wiltshire Council, in response⁸ to the Inspector's letter, suggested that the requirement of 37,000 homes in the Core Strategy be replaced with 42,000, and the Inspector has confirmed⁹ that this '*seems reasonable*'.

3.1.2 Housing requirements for Wiltshire as a whole have been assessed through the Core Strategy SA with sustainability effects identified for three potential options:

Option 1: A housing range between 35,800 and 42,100 new dwellings

Option 2: 56,800 new dwellings

Option 3: 20,900 new dwellings

3.1.3 The proposed new requirement of 42000 dwellings has therefore already been assessed in the SA as part of Option 1 and the Core Strategy Inspector recognises this in his 10th procedural letter to the Council where he states '*the preferred Option 1 within the Council's SA identifies the broad acceptability of between 35,800 and 42,100 new homes*'.

3.1.4 The SA has found that any provision of housing is likely to have some adverse impacts on the natural environment, but that '*it is likely that in order to best achieve a balance between protecting and enhancing the environment and pursuing housing growth that will lead to significant social and economic benefits, the mid-range housing scenario (Option 1) should be pursued, provided there are strong links to Core Strategy policies that will ensure housing growth is sustainable and provided this is justified through the Core Strategy evidence base*' (para 5.4.51).

3.1.5 The SA acknowledges in para 5.4.49 that '*many of the potential environmental impacts could be successfully mitigated or reduced through careful consideration of location and incorporation of high levels of sustainability*' and that providing housing provision, at the right

⁷ 10th Procedural letter (Planning Inspectorate, 2 December 2013)

⁸ Wiltshire Council response to 10th Procedural letter (Wiltshire Council, 19 December 2013)

⁹ 11th Procedural letter (Planning Inspectorate, 23 December 2013)

level and in the right place, will help meet the growing need for housing of all types in an area with a growing population. Para 5.4.36 of the SA states that ‘*increasing delivery may have a positive impact on housing affordability in Wiltshire, and should increase levels of affordable housing provision*’.

3.2 Community area strategies

3.2.1 Wiltshire Council has sought to disaggregate the revised housing requirement between community areas and settlements in a way that maintains the integrity of the spatial strategy and current balance of growth. The disaggregation to community areas 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 a Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision.

3.2.2 To achieve this disaggregation, the Council have produced a methodology¹⁰ which has led to a proposed revised indicative distribution across community areas. The justification for this disaggregation is explained in this methodology.

3.2.3 The revised disaggregation across Housing Market Areas (HMA) and community areas is as follows:

Area	Housing requirement in Wiltshire Core Strategy Submission Draft	Proposed revised indicative distribution
Devizes town	1730	2010
Devizes remainder	420	490
Marlborough town	610	680
Marlborough remainder	240	240
Pewsey	600	600
Tidworth & Ludgershall	1750	1750
Tidworth remainder	150	170
East Wiltshire HMA	5500	5940
Amesbury, Bulford & Durrington	2100	2440
Amesbury remainder	295	345
Mere town	200	235
Mere remainder	50	50
Salisbury City/Wilton town	6060	6060
Wilton remainder	220	255
Downton town	190	190
Southern Wiltshire remainder	365	425
Tisbury town	200	200
Tisbury remainder	220	220
South Wiltshire HMA	9900	10420
Bradford on Avon town	510	595
Bradford on Avon remainder	160	185
Calne town	1240	1440
Calne remainder	140	165
Chippenham town	4000	4510
Chippenham remainder	500	580
Corsham town	1050	1220
Corsham remainder	150	175
Malmesbury town	760	885

¹⁰ Methodology for disaggregation of increased housing requirement to community area and housing market area level (Wiltshire Council, January 2014)

Malmesbury remainder	440	510
Melksham town	1930	2240
Melksham remainder	110	130
Royal Wootton Bassett town	920	1070
Royal Wootton Bassett & Cricklade remainder	330	385
Trowbridge town	5860	6810
Trowbridge remainder	140	165
Warminster town	1650	1920
Warminster remainder	120	140
Westbury town	1290	1500
Westbury remainder	100	115
North and West Wiltshire HMA	21400	24740
West of Swindon	200	900
Wiltshire	37000	42000

3.2.4 In the Core Strategy SA Report, an assessment of the sustainability implications of each community area policy (Core Policies 4, 7-8, 10-15, 17-20, 24, 26-27, 29 and 31-33), and reasonable alternatives to those policies, was undertaken; these policies included a housing requirement for each community area and also for the principal settlements and market towns within those areas. This addendum, in the following sections, will seek to highlight any additional sustainability effects of the revised housing requirement, for each community area, that have not already been highlighted in the SA Report.

3.3 Core Policy 4 – Spatial Strategy: Amesbury community area

3.3.1 The spatial strategy for the Amesbury community area was adopted as part of the South Wiltshire Core Strategy in February 2012. This spatial strategy was carried forward into the submission version of the Wiltshire Core Strategy and no amendments were made to the strategy at that time. The Core Strategy SA Report stated that, because the original strategy had not been amended, and was adopted, no further SA work was required.

3.3.2 The original Amesbury spatial strategy referred to the provision of at least 2100 homes in Amesbury (which includes Durrington and Bulford) and at least 295 homes in the rest of the community area.

3.3.3 The South Wilts SA Report noted that this policy performed well on the social objectives relating to housing and social inclusion. It was considered that the policy will help to create development which meets identified needs with indirect long term benefits for the economy through housing provision. The SA noted some minor adverse effects on the natural environment which can be expected from development, particularly on Greenfield land, and stated that due to the archaeological importance of the Salisbury, Stonehenge and Amesbury area there is potential for adverse impact due to the level of development proposed. However, it considered that this had been taken into consideration in the existing allocations and should be dealt with at site level in future allocations.

3.3.4 The revised housing requirement is for a proposed 2440 new homes at Amesbury, Bulford and Durrington and 345 proposed in the area remainder. This is a sizeable increase but is considered achievable in sustainability terms, depending on the future location of development sites, which are not known at this stage, and the mitigation of any adverse effects. Future development will need to avoid adverse effects on the Stonehenge and Avebury World Heritage Site, but this is achievable through careful selection of future sites.

- 3.3.5 Much of the proposed additional housing is likely to be developed on Greenfield sites which may result in localised environmental effects and mitigation measures will be required at site level. These effects cannot be determined at this stage but they are not considered significant and are not likely to impact on the AONB in the south west of the area. The social and economic benefits likely, as already highlighted in the SA, should be increased through this additional requirement which will help meet the housing needs of the area and provide a local workforce for existing and future businesses.
- 3.3.6 It should also be noted that a considerable number of additional homes are currently planned for the settlements of Bulford and Larkhill in this community area as part of the army re-basing programme and this will add to the cumulative effects on landscape and infrastructure. Details of specific numbers and locations are not known at this stage and this is not included in the revised Core Policy 4. Further assessment of the effects of army re-basing will be required.
- 3.3.7 The Wiltshire Core Strategy HRA¹¹ has confirmed that *'additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other community area policies in the catchment but that additional housing can be accommodated within the licensed headroom which has been assessed as HRA compliant; therefore it can be concluded that there would be no adverse effect upon site integrity. Additional housing will further increase recreational pressure upon Salisbury Plain SPA in combination with other community area policies in the plan but that Core Policy 50 and the Salisbury Plain Management Strategy will continue to ensure that this additional housing would have no adverse effect upon site integrity'*.

3.4 Core Policy 7 – Spatial Strategy: Bradford on Avon community area

- 3.4.1 It is proposed that an additional 85 dwellings will be required in Bradford-on-Avon town over the Plan period and an additional 25 dwellings proposed in the rest of the community area.
- 3.4.2 The SA Report has highlighted potential impacts of development on the Bath and Bradford-on-Avon Bats SAC, Cranborne Chase and West Wiltshire Downs AONB and the West Wiltshire green belt.
- 3.4.3 The potential for significant adverse effects was noted against the biodiversity SA objective because of potential impacts on the SAC. The SA stated that the majority of impacts in the Bradford area will probably come through the cumulative effects of multiple, small-scale developments over the long-term, but that these cumulative effects can be addressed through a developers' guidance document and site level Appropriate Assessment (AA). Core Policy 7 confirms that 'all development will be planned and delivered in accordance with Wiltshire Council guidance to maintain the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC)'.
- 3.4.4 Core Policy 50 now confirms that the Wiltshire Bats SAC Planning Guidance is available and applicable to all development types in the areas within and surrounding Bradford-on-Avon, Box, Colerne, Corsham, Trowbridge, Westbury, Fonthill and Chilmark, so it is considered that impacts arising from future development in the Bradford-on-Avon community area could be successfully mitigated by following this guidance and through site level Appropriate Assessment.

¹¹ Update to the Wiltshire Core Strategy Habitats Regulations Assessment (Wiltshire Council, February 2014)

3.4.5 The Wiltshire Core Strategy HRA¹² has confirmed that '*additional housing in this area could potentially put additional pressure upon the Bath and Bradford on Avon Bats SAC through habitat and roost loss, although this would be dependent upon the detailed location and design of the development. CP50 and the Wiltshire Bats SAC guidance would continue to provide an effective mechanism to ensure that this additional housing would have no adverse effect upon site integrity*'.

3.4.6 Future development is likely to result in a number of positive and negative effects against other SA objectives but that these are unlikely to be significant given the relatively modest additional development proposed. The likely positive and negative effects of the Bradford-on-Avon spatial strategy are highlighted in the SA Report. The effects of future development will need to be assessed at a site-specific level when sites come forward over the plan period.

3.5 Core Policy 8 – Spatial Strategy: Calne community area

3.5.1 It is proposed that an additional 200 dwellings will be required in Calne town over the Plan period and an additional 25 dwellings proposed in the rest of the community area.

3.5.2 The Core Strategy SA Report has highlighted the expected significant benefits from the level of growth in Calne in relation to providing housing to meet needs, including affordable housing, and the benefits of this provision for supporting the local economy and increasing self-containment. The additional proposed housing is likely to increase these benefits further.

3.5.3 The Core Strategy SA Report also highlighted the possible significant adverse effect of this level of growth on traffic levels through Calne which at certain times of day can lead to significant congestion. This has led to the designation of an Air Quality Management Area (AQMA) in the town centre. It is not suggested that this is just related to housing growth – there are a number of factors that contribute to traffic issues in Calne and it is not considered that this additional housing will significantly exacerbate air quality issues – but increasing housing provision in the town may add to the effects.

3.5.4 The impact of any future development on the strategic road network must be taken into consideration with appropriate contributions to demand management solutions. The mineral and waste facilities located on the edge of Calne are also a particular source of heavy vehicles and further work is needed to identify an appropriate solution to reducing the impact of this traffic on the town.

3.5.5 The SA considers that Calne can accommodate the additional housing proposed without leading to additional significant effects against the SA objectives but that this development must contribute to essential infrastructure in Calne that has not been provided with past development. This must include infrastructure that provides solutions to the transport and air quality issues. The effects of future development will need to be assessed at a site-specific level when sites come forward over the plan period.

¹² Update to the Wiltshire Core Strategy Habitats Regulations Assessment (Wiltshire Council, February 2014)

3.6 Core Policy 10 – Spatial Strategy: Chippenham community area

3.6.1 The Core Strategy SA Report assessed Core Policy 10 which included a housing requirement of at least 4500 new homes in the community area, with 4000 of those provided in Chippenham town. The policy included a number of strategic sites and the SA presented an assessment of a wide range of potential strategic options which included those strategic sites set out in the policy. Significant effects and potential mitigation measures that could reduce those effects for CP10 are highlighted in the SA Report in Section 5.12. To summarise, these effects related to:

Significant benefits

Housing provision
Healthy communities
Social inclusion and poverty
Provision of community facilities
Economic development
Employment

Significant adverse effects

Land and soil resources
Waste management
Water resources
Climatic factors

3.6.2 The Core Strategy Inspector, in his 10th procedural letter to the Council dated 3rd December 2014, states that he finds it necessary for the Council to review its approach to development allocations at Chippenham and suggests that this could be secured through a subsequent Sites Allocations Development Plan Document (DPD). Wiltshire Council responded by agreeing to produce a DPD specific to Chippenham which will at least meet indicative housing requirements¹³ and for Core Policy 10 to be modified through the removal of the strategic allocations. In order to provide the right context for this, it was proposed that the level of growth for the town would still be identified within Core Policy 10.

3.6.3 The scale of housing requirements in Core Policy 10 is expressed as a minimum to reflect the further work needed to achieve a pattern of development that can best realise the town's economic potential. The Chippenham Sites Allocation DPD will support the area strategy; it will focus on identifying land for mixed use development adjoining the built up area. Limited land opportunities have inhibited development in the past, and this needs to be addressed urgently, but growth also needs to be underpinned by investment in new infrastructure. It is considered that Chippenham will benefit from a more detailed framework that co-ordinates growth and key infrastructure necessary to deliver a more resilient long term future.

3.6.4 Two options have been considered for the proposed amendments to Core Policy 10, which include the removal of the strategic allocations and an increase in the housing requirement. Unlike other areas, Chippenham Town housing requirements are retained as a minimum¹⁴. Options are as follows:

Option 1

Strategic allocations are deleted and substituted with a general requirement for strategic allocations at Chippenham for an amended scale of housing development to come forward through a Chippenham Sites Allocations DPD. Scale of employment land remains the same.

¹³ The proposed DPD will include the Chippenham community area incorporating parts of Corsham and Calne community area which are adjacent to the built area of Chippenham town

¹⁴ See Section 7 of Topic Paper Addendum Report: Housing Technical Paper for further explanation.

Over the plan period (2006 to 2026), 26.5 ha of new employment land (in addition to that already provided or committed) and approximately 5,090 new homes will be provided. At least 4,510 dwellings should occur at Chippenham.

Option 2

Strategic allocations are deleted and criteria set to provide a basis for selecting preferred area(s) of search as a strategic context for site allocation in a supporting DPD. Scale of housing amended but scale of employment land remains the same. Over the plan period (2006 to 2026), 26.5 ha of new employment land (in addition to that already provided or committed) and approximately 5,090 new homes will be provided. At least 4,510 dwellings should occur at Chippenham.

The criteria would provide some certainty on the requirements for new strategic sites and strategic objectives. Areas for growth and site allocation within the DPD will be guided by the following criteria (these derive broadly from the description of issues reported in the Core Strategy, such as the issues and considerations listed in paragraph 5.48):

- 1. The scope for the area to ensure the delivery of premises and land for employment development reflecting the priority to support local economic growth and settlement resilience*
- 2. The capacity to provide a mix of house types, for both market and affordable housing alongside the timely delivery of the facilities and infrastructure necessary to serve them;*
- 3. Improves local traffic access to the primary road network and redresses traffic impacts affecting the attractiveness of the town centre*
- 4. Improves accessibility by alternatives to the private car to the town centre, railway station, schools and colleges*
- 5. Has an acceptable landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, improves biodiversity and access to the countryside*
- 6. Avoids all areas of flood risk (therefore within zone 1) and surface water management reduces the risk of flooding elsewhere*

Discussion

3.6.5 The revised policy includes a significant minimum increase in additional new homes for the community area and it is considered that the range of significant effects already highlighted in the SA Report are still relevant and likely to occur through this level of growth. However, a number of potential mitigation measures are highlighted that if employed, could substantially reduce the impacts of this growth.

3.6.6 The precise nature of the impacts of development is less certain now because of the removal of the strategic allocations. There are short-term uncertainties of housing delivery now and with no strategic sites allocated, there is the real possibility of applications being made on sites that are less sustainable, sites that have not been considered through the Core Strategy consultation process and not subject to SA or HRA. It is recognised that even with the previous allocation of strategic sites, the location of a substantial amount of growth in the community area was still unknown.

- 3.6.7 Growth will still be allocated through the Chippenham Sites Allocations DPD and Wiltshire Housing Sites Allocations DPD, respectively, and these allocations will be informed by formal and informal consultation, an updated evidence base, SA and HRA. However, it is recognised that adoption of these DPDs is some way off and in the meantime, there will be uncertainty on the sustainability of the direction of growth at Chippenham, housing delivery and potential environmental and economic impacts of unplanned growth in less sustainable locations. It is considered that Core Policy 10 is less sustainable than before as a result of the removal of the strategic allocations but that uncertainties are likely to be less over the medium-long term.
- 3.6.8 With regards the two options outlined in paragraph 3.6.3, it is not considered that these are sufficiently different to lead to large differences in sustainability effects, although the inclusion of additional criteria in this Core Strategy policy is considered reasonable and appropriate and likely to have some benefit. Many of these criteria are already covered by other Core Strategy policies and the NPPF, although not specific to Chippenham as these criteria are.
- 3.6.9 It is considered that the housing requirement proposed for Chippenham, including the provision of the additional 590 new homes proposed in the community area, can be achieved and accommodated on sustainable sites both within the urban area and on greenfield sites on the edge of Chippenham, and in the remainder of the community area, and that these sites are already identified in the SHLAA. This will help to meet housing need and especially need for affordable housing in Chippenham and the wider Wiltshire area.
- 3.6.10 Specific effects of growth at Chippenham have been highlighted and discussed in the SA Report; many of these effects are connected to the level of growth involved and not specific to Chippenham, although particular issues regarding provision of sufficient infrastructure to meet the high growth levels and transport were highlighted as key issues. However, it is not considered that these issues pose a significant barrier to growth at Chippenham and mitigation measures to reduce the impacts of the additional housing requirement are considered feasible.
- 3.6.11 Chippenham is relatively unconstrained with regard to national and European environmental designations. There are specific areas of flood risk associated with the River Avon but sufficient land available for development so that these areas can be adequately avoided.
- 3.6.12 The SA considers that the additional housing growth being proposed in this policy is achievable without further significant adverse effects against the SA objectives. Further sustainability issues may arise but these will relate to specific sites that may come forward in the future and these cannot be predicted through the SA at this time. It is considered, however, that any site-specific issues that may arise are capable of being managed through local mitigation measures at a local level.
- 3.6.13 The Chippenham Sites Allocations DPD and Wiltshire Housing Sites Allocations DPD will be subject to their own SA and HRA assessments, as well as wide ranging consultation, and therefore there will be further opportunities to assess the environmental and sustainability implications of policies and sites proposed.

3.7 Core Policy 11 – Spatial Strategy: Corsham community area

- 3.7.1 It is proposed that an additional 170 dwellings will be required in Corsham town over the Plan period and an additional 25 dwellings proposed in the rest of the community area.
- 3.7.2 The Core Strategy SA Report did not highlight any anticipated significant adverse effects from the level of growth previously proposed for Corsham and it is not considered that the additional proposed housing will lead to further significant effects. The SA highlighted that all of Corsham is within a groundwater Source Protection Zone and careful consideration should be given to this for the location and type of future development.
- 3.7.3 There are green belt and AONB designations in the west of the community area but it is considered that there are suitable development sites/locations available that will avoid impacting on these.
- 3.7.4 Specific issues regarding the impacts on the Bath and Bradford on Avon Bats SAC have been highlighted in the SA previously; these issues are associated with bat roosts in certain underground Bath stone mines. Further development has the potential to adversely affect these roosts but Core Policy 11 confirms that ‘all development will be planned and delivered in accordance with Wiltshire Council guidance to maintain the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC)’. Core Policy 50 now confirms that the Wiltshire Bats SAC Planning Guidance is available and applicable to all development types in the areas within and surrounding Bradford-on-Avon, Box, Colerne, Corsham, Trowbridge, Westbury, Fonthill and Chilmark, so it is considered that impacts arising from future development in the Corsham community area could be successfully mitigated by following this guidance and through site level AA.
- 3.7.5 The Wiltshire Core Strategy HRA¹⁵ has confirmed that *‘additional housing in this area could potentially put additional pressure upon the Bath and Bradford on Avon Bats SAC through habitat and roost loss, although this would be dependent upon the detailed location and design of the development. Core Policy 50 and the Wiltshire Bats SAC guidance would continue to provide an effective mechanism to ensure that this additional housing would have no adverse effect upon site integrity’*.
- 3.7.6 Future development is likely to result in a number of positive and negative effects against other SA objectives but that these are unlikely to be significant given the relatively modest additional development proposed. The likely positive and negative effects of the Corsham spatial strategy are highlighted in the SA Report. The effects of future development will need to be assessed at a site-specific level when sites come forward over the plan period.

3.8 Core Policy 12 – Spatial Strategy: Devizes community area

- 3.8.1 It is proposed that an additional 280 dwellings will be required in Devizes town over the Plan period and an additional 70 dwellings proposed in the rest of the community area.

¹⁵ Update to the Wiltshire Core Strategy Habitats Regulations Assessment (Wiltshire Council, February 2014)

- 3.8.2 The Core Strategy SA Report concluded that the previous level of housing growth required in Devizes was likely to lead to significant adverse effects in the areas of land and soil resources, air quality and environmental pollution, climatic factors, landscape and transport. The proposed additional level of growth is considered achievable in terms of availability of suitable and sustainable sites but impacts concerning traffic, air quality and the AONB are likely to be exacerbated. There is also a lack of available brownfield sites so the majority of growth will need to be located on Greenfield sites on the edge of the existing urban area.
- 3.8.3 The Core Strategy SA Report has also stated the significant benefits expected from a significant level of new housing in terms of the local economy, self-containment, affordable housing provision and a greater level of support for services, facilities, shops and other local businesses in the town.
- 3.8.4 It is considered that the revised level of growth is achievable without leading to significantly greater effects on the issues stated, but only if this development contributes significantly to infrastructure that will ease and not add to current traffic and air quality issues. At present, the majority of traffic heading through Devizes on the A361 is of a local nature and this leads to congestion and health effects of air pollution in the town centre because there are no alternative routes to take.
- 3.8.5 It is considered that the revised community remainder figure is achievable considering there are a number of large villages in the community area without significant environmental constraints
- 3.8.6 The Core Strategy SA Report has stated that where future development proposals come forward, there should be careful consideration of schemes to significantly reduce private car use by investing in sustainable transport solutions that offer a real choice of modes. Future economic growth is constrained by congestion on the local highway network and some alleviation can be achieved through upgrades to existing junctions to be delivered in combination with current committed and future housing growth. The impact of any future development on the strategic road network must be taken into consideration with appropriate contributions to demand management solutions.
- 3.8.7 The Core Strategy, paragraph 5.65, identifies traffic congestion as a major issue and that this will be a significant consideration when discussing future growth in Devizes. The findings of the Devizes Town Transport Strategy will help determine future policy with regards transport but also future locations for housing development will play a crucial role in determining future effects on the road network.
- 3.8.8 With regards landscape impacts on the AONB, there are development locations on the edge of Devizes where impacts on the AONB could be significantly avoided. A more detailed landscape assessment should accompany all future development proposals to assess impacts and identify suitable mitigation for likely effects on the AONB. Because there are no strategic housing sites identified for Devizes in the Core Strategy, there is the possibility of significant cumulative landscape impacts from a number of smaller development sites and these may be more difficult to mitigate.

3.9 Core Policy 13 – Spatial Strategy: Malmesbury community area

- 3.9.1 It is proposed that an additional 125 dwellings will be required in Malmesbury town over the Plan period and an additional 70 dwellings proposed in the rest of the community area.
- 3.9.2 The Core Strategy SA Report considered that there were few significant effects anticipated through the Malmesbury spatial strategy. The only significant adverse effect noted was the lack of brownfield sites in the town and therefore that the majority of new development will need to come forward on Greenfield sites. The revised level of housing will provide benefits through housing provision, including affordable housing, and will have beneficial economic impacts through further support for local schools, shops, businesses and a range of services and facilities.
- 3.9.3 The one significant environmental constraint to future development is the proximity of the Cotswold AONB to the west of Malmesbury and this will require careful consideration of future development sites. These are not known at this stage and therefore it is difficult to predict effects but sufficient assessment will be required at a site level, including a landscape and visual assessment, in order to avoid adversely affecting the AONB or its setting.
- 3.9.4 It is considered that the revised housing requirement is acceptable in sustainability terms for this community area. There are no significant constraints that will prevent this level of development and mitigation measures are possible to enable adverse effects to be avoided.

3.10 Core Policy 14 – Spatial Strategy: Marlborough community area

- 3.10.1 It is proposed that an additional 70 dwellings will be required in Marlborough town over the Plan period with no additional dwellings proposed in the rest of the community area.
- 3.10.2 Natural England has raised significant concerns about the scale of development proposed in the County's AONBs. In particular it has made specific objections about the expansion of Marlborough and the release of greenfield sites¹⁶. These objections have been supported by the relevant AONB management boards¹⁷.
- 3.10.3 In Marlborough, the single acceptable strategic site cannot be readily expanded as, amongst other possible issues, it needs to remain contained below a certain height up the hillside. The indicative scale of proposed development reflects an approximate capacity of the urban area to deliver new housing from evidence of sites put forward through the SHLAA process.
- 3.10.4 The Core Strategy SA Report does not highlight any likely significant effects from the Marlborough spatial strategy, and housing requirements within that. The SA noted the location of Marlborough and the community area entirely within the North Wessex Downs AONB, and that this is the reason for a relatively lower housing requirement than other areas to reflect that. The SA also notes that there are a number of sites of nature conservation importance lying in close proximity to the town, particularly Savernake Forest SSSI, River Kennet SSSI / CWS and Marlborough Railway Tunnel CWS.

¹⁶ Letter from Natural England to Wiltshire Council, 25th June 2013 (EXAM/31)

¹⁷ Representation by The North Wessex Downs AONB Office, November 2012 (REP/06)

3.10.5 The Wiltshire Core Strategy HRA¹⁸ has confirmed that *'additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the Kennet and Lambourn Floodplain SAC in combination with other community area policies in the catchment. Additional housing can be accommodated within the licensed headroom which has been assessed as HRA compliant; therefore it can be concluded that there would be no adverse effect upon site integrity'*.

3.10.6 It is considered that Marlborough town can accommodate the additional 70 dwellings proposed without significantly impacting on the SA objectives considered in this assessment. However, this will depend on the nature and location of future development proposals and these must be accompanied by relevant assessments to show evidence that the proposals will not adversely impact on the sensitive nature of the environment in and around Marlborough.

3.11 Core Policy 15 – Spatial Strategy: Melksham community area

3.11.1 It is proposed that an additional 310 dwellings will be required in Melksham town over the Plan period and an additional 20 dwellings in the rest of the community area.

3.11.2 The Core Strategy SA Report highlighted the significant economic and social benefits that could be anticipated from a relatively high level of growth in Melksham and noted the relative lack of environmental constraints that may prevent development in the town. These benefits are likely to be further increased with this relatively high additional level of housing if accompanied by essential infrastructure to meet needs arising from this growth and the emerging neighbourhood plan can address issues concerning the location of future development and infrastructure provision.

3.11.3 The SA did note the likelihood of significant adverse effects relating to land and soil resources, waste management, climatic factors and transport but this is related to the relatively high level of growth proposed and such adverse effects have also been recognised for other community areas with proposed high levels of growth.

3.11.4 It is possible that the additional housing requirements proposed will significantly add to pressure on the A350 to the west of the town and future development should address this through consideration of investment in sustainable forms of transport that will not lead to significant increases in existing traffic levels. A transport assessment will be required for any major development proposal, in particular identifying appropriate mitigation against any significant impact on transport users, local communities and the environment. This should include assessing the impact of growth on the wider area, for example in the Lacock area.

3.11.5 It is considered that there are no significant environmental constraints that would prevent this additional level of growth being achieved in Melksham and the SA does not highlight any additional significant effects that have not already been predicted.

¹⁸ Update to the Wiltshire Core Strategy Habitats Regulations Assessment (Wiltshire Council, February 2014)

3.12 Core Policy 17 – Spatial Strategy: Mere community area

- 3.12.1 The spatial strategy for the Mere community area was adopted as part of the South Wiltshire Core Strategy in February 2012. The South Wilts SA Report concluded that the overall spatial strategy was considered to be a sustainable proposal. This spatial strategy was carried forward into the submission version of the Wiltshire Core Strategy and no amendments were made. The Core Strategy SA Report stated that, because the original strategy had not been amended, and was adopted, no further sustainability appraisal work was required.
- 3.12.2 The original Mere spatial strategy referred to the provision of 200 homes in Mere and 50 homes in the rest of the community area. The revised housing requirement is for 235 new homes in Mere and approximately 50 in the rest of the community area. This modest increase reflects the location of Mere and its proximity to the Cranborne Chase and West Wiltshire Downs AONB.
- 3.12.3 The SA considers that the increase of 35 dwellings can be accommodated in Mere but that very careful consideration should be given to the location of future sites to avoid adversely impacting on the AONB and its setting. As well as careful consideration of location, other mitigation measures such as the design and layout of development can help avoid impacts on the special quality of the designated landscape.

3.13 Core Policy 18 – Spatial Strategy: Pewsey community area

- 3.13.1 No additional housing is proposed for the Pewsey community area due to concerns over the effect of further development on the North Wessex Downs AONB and therefore no further assessment is required. The assessment of effects of the current housing requirement is included within the Pewsey spatial strategy section of the Core Strategy SA Report.

3.14 Core Policy 19 – Spatial Strategy: Royal Wootton Bassett and Cricklade community area

- 3.14.1 It is proposed that an additional 150 dwellings will be required in Royal Wootton Bassett over the Plan period and an additional 55 dwellings in the rest of the community area.
- 3.14.2 The Core Strategy SA Report does not highlight any significant adverse effects from the previously proposed level of growth in this community area. A number of significant benefits were considered likely in relation to housing provision, economic growth and employment provision.
- 3.14.3 It is considered that there are no specific environmental constraints that would prevent the additional housing requirement from being achieved. Royal Wootton Bassett has met much of its housing requirement already in the Plan period but there are sustainable locations for development in the town as well as in Cricklade and villages and there are emerging neighbourhood plans that could help bring forward development if necessary.
- 3.14.4 It is considered that the proposed additional growth is achievable and will not lead to additional significant effects.

3.15 Core Policy 20 – Spatial Strategy: Salisbury community area

- 3.15.1 The spatial strategy for the Salisbury community area was adopted as part of the South Wiltshire Core Strategy in February 2012. The South Wilts SA Report concluded that the overall spatial strategy was considered to be a sustainable proposal. This spatial strategy was carried forward into the submission version of the Wiltshire Core Strategy and no amendments were made. The Core Strategy SA Report stated that, because the original strategy had not been amended, and was adopted, no further sustainability appraisal work was required.
- 3.15.2 The housing requirement in Salisbury city, including Wilton, is not proposed to change in the current revision and therefore no further SA is required. The adopted South Wiltshire Core Strategy has provided certainty on what new housing sites should be developed. The Strategy, adopted in 2012, identifies a significant increase in land available for development particularly at Salisbury and Wilton. However rates of house building have not increased markedly from the trend of several years past and have failed to match plan expectations. Allocations and deliverable supply ensure a good range of land opportunities to developers.

3.16 Core Policy 24 – Spatial Strategy: Southern Wiltshire community area

- 3.16.1 The spatial strategy for the Southern Wiltshire community area was adopted as part of the South Wiltshire Core Strategy in February 2012. The South Wilts SA Report concluded that the overall spatial strategy was considered to be a sustainable proposal. This spatial strategy was carried forward into the submission version of the Wiltshire Core Strategy and no amendments were made. The Core Strategy SA Report stated that, because the original strategy had not been amended, and was adopted, no further sustainability appraisal work was required.
- 3.16.2 The revised disaggregation proposes no further housing in Downton but an additional 60 dwellings in the rest of the community area. The main areas with environmental designations in this community area likely to be affected by further development are the New Forest National Park and Cranborne Chase and West Wiltshire Downs AONB and it is considered reasonable that no further development is proposed in Downton because of its proximity to the national park boundary. The Appropriate Assessment of the likely effects of development on the New Forest SPA¹⁹ concluded that even small scales of development in combination with increases in visitors from developments promoted in other districts created the potential for adverse effects which cannot be ruled out. Natural England does not object to the currently proposed levels. To avoid the potential for likely significant effects the current scale of development is retained.
- 3.16.3 The Core Strategy sets a framework to control development in neighbouring areas to the national park from having a detrimental impact, and where such development would increase recreational pressures upon the Natura 2000 designations of the New Forest mitigation is required through the implementation of the Recreation Management Strategy.

¹⁹ South Wiltshire Proposed Submission Core Strategy Habitats Regulations Assessment, July 2009

- 3.16.4 The Wiltshire Core Strategy HRA²⁰ has confirmed that *'additional housing will further increase recreational pressure upon the New Forest SPA in combination with new housing proposed outside of Wiltshire, but in and around the New Forest. Core Policy 50 and the New Forest Recreation Management Strategy would continue to ensure that this additional housing would have no adverse effect upon site integrity'*.
- 3.16.5 The Core Strategy also states that development within the Cranborne Chase and West Wiltshire Downs AONB will need to give particular attention to the preservation of the character and scenic quality of the environment and states that where proposals come forward emphasis will be placed on their scale, location, siting, design, materials and landscaping. It is important that this requirement also relates to development outside the AONB but which could impact upon its setting.
- 3.16.6 It is considered that mitigation measures are possible and likely to prevent an additional 60 dwellings in the community area from leading to additional adverse effects which have not already been highlighted in the South Wilts Core Strategy SA Report and Wiltshire Core Strategy SA Report. It is, however, possible that any new development will generate effects at a local level and these effects will need to be assessed as and when planning applications are made.

3.17 Core Policy 26 – Spatial Strategy: Tidworth community area

- 3.17.1 No additional dwellings are proposed in Tidworth and Ludgershall over the Plan period. A relatively significant amount of land has previously been proposed for the expansion of Tidworth and Ludgershall already, linked to growth stimulated in large part by the army rebasing taking place in the coming years. A further increase is considered unrealistic. An additional 20 dwellings are proposed in the rest of the community area.
- 3.17.2 The Core Strategy SA Report already highlights a number of significant effects of the relatively significant growth proposed for Tidworth and Ludgershall, with suggestions for potential mitigation measures for adverse effects, and no further housing growth is being proposed in these settlements.
- 3.17.3 The Wiltshire Core Strategy HRA²¹ has confirmed that *'additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other community area policies in the catchment. Additional housing can be accommodated within the licensed headroom which has been assessed as HRA compliant; therefore it can be concluded that there would be no adverse effect upon site integrity. Additional housing will further increase recreational pressure upon Salisbury Plain SPA in combination with other community area policies in the plan. Core Policy 50 and the Salisbury Plain Management Strategy would continue to ensure that this additional housing would have no adverse effect upon site integrity'*.
- 3.17.4 It is considered that the additional 20 dwellings required in the remainder of the community area will not lead to additional significant effects, although this will be dependent on the nature and location of future development proposals. The North Wessex Downs AONB covers a large area in the north and east of the community area and this will constrain significant development occurring.

²⁰ Update to the Wiltshire Core Strategy Habitats Regulations Assessment (Wiltshire Council, February 2014)

²¹ Update to the Wiltshire Core Strategy Habitats Regulations Assessment (Wiltshire Council, February 2014)

3.18 Core Policy 27 – Spatial Strategy: Tisbury community area

- 3.18.1 The spatial strategy for the Tisbury community area was adopted as part of the South Wiltshire Core Strategy in February 2012. This spatial strategy was carried forward into the submission version of the Wiltshire Core Strategy and no amendments were made. The Core Strategy SA Report stated that, because the original strategy had not been amended, and was adopted, no further sustainability appraisal work was required.
- 3.18.2 The housing requirement in Tisbury town and Tisbury community area is not proposed to change in the current revision due to concerns over the effect of further development on the Cranborne Chase and West Wiltshire Downs AONB and therefore no further SA is required.

3.19 Core Policy 29 – Spatial Strategy: Trowbridge community area

- 3.19.1 It is proposed that an additional 950 dwellings will be required in Trowbridge over the Plan period and an additional 25 dwellings in the rest of the community area.
- 3.19.2 The Core Strategy SA Report highlights a number of significant adverse effects and benefits associated with the relatively high housing requirement for Trowbridge and the proposed additional requirement is a significant increase. However, it is considered that this level of housing growth can be accommodated on sustainable sites both within the central area of Trowbridge and on greenfield sites on the edge of Trowbridge that have been identified in the SHLAA, and that this will help to meet housing need and especially need for affordable housing in Wiltshire.
- 3.19.3 Significant adverse effects have already been noted relating to the issues of land and soil resources, water resources and climatic factors, but this is connected to the level of growth involved, not specific to Trowbridge. The SA has highlighted particular concerns with growth at Trowbridge regarding provision of sufficient infrastructure to meet the needs of a growing population, including the provision of sufficient secondary education facilities which may require growth to be appropriately phased until this provision is available. Also, the need for improvements to the highway network (particularly the A350) and provision of cultural, health and recreational facilities to meet local needs. However, it is not considered that these issues pose a barrier to growth and mitigation measures are feasible.
- 3.19.4 Trowbridge is relatively unconstrained with regard to landscape and other environmental designations but the West Wiltshire Green Belt is a significant constraint to the west side of the town and this boundary may need to be reviewed. A significant issue highlighted in the SA and HRA is the presence of Bechstein's bat roosts and foraging grounds in a number of locations in and around Trowbridge. These are protected under the Habitats Directive, forming part of the Bath and Bradford on Avon SAC, and future development must avoid adverse effects on the integrity of the SAC. It has been shown through the masterplanning work for the Ashton Park extension that mitigation measures can be agreed to avoid adverse effects on this population and therefore possible that measures can be agreed for future development sites.

3.19.5 The Wiltshire Core Strategy HRA²² has stated that *'this significant uplift in housing numbers for Trowbridge appears to direct them towards Green Lane / Biss Woods and this is likely to increase pressures on Bechstein's maternity roosts in this area through habitat loss / fragmentation from housing and infrastructure and recreational pressures on the wood'*. It recommends amendments to Core Policy 29 as follows:

- Direct future growth away from the south east of the town
- Wiltshire Housing Sites Allocations DPD to consider all options for growth including Greenbelt release
- Core Policy 29 to set criteria for site selection including potential HRA issues
- Reinstate the original housing figure for Ashton Park Urban Extension

3.19.6 The SA considers that the additional housing growth being proposed is achievable without further significant adverse effects against the SA objectives. Further sustainability issues may arise but these will relate to specific sites that may come forward in the future and these cannot be predicted by the SA. It is considered, however, that any site-specific issues that may arise are capable of being managed through local mitigation measures at local level.

3.20 Core Policy 31 – Spatial Strategy: Warminster community area

3.20.1 It is proposed that an additional 270 dwellings will be required in Warminster town over the Plan period and 20 additional dwellings in the rest of the community area.

3.20.2 The Core Strategy SA Report has highlighted a number of potential significant effects, both positive and negative, with the spatial strategy for Warminster, which previously included a requirement for 1650 dwellings in Warminster town. The SA noted that there are a number of environmental constraints around the town associated with landscape designations and the River Avon but also stated that adverse effects associated with development were capable of being mitigated, as has been shown through the masterplanning process for the West Warminster urban extension.

3.20.3 The increased level of housing is likely to increase the economic and social benefits for the community area, helping to meet housing (and affordable) need and it is considered that there are sustainable sites available in and around Warminster, and in the rest of the community area, as evidenced by the SHLAA. Some of these sites are identified in the SHLAA as being 'suitable with potential constraints' and further assessments will be required as and when future development sites come forward.

3.20.4 The Wiltshire Core Strategy HRA²³ has confirmed that *'additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other community area policies in the catchment. Additional housing can be accommodated within the licensed headroom which has been assessed as HRA compliant; therefore it can be concluded that there would be no adverse effect upon site integrity. Additional housing will further increase recreational pressure upon Salisbury Plain SPA in combination with other CA policies in the plan. CP50 and the Salisbury Plain*

²² Update to the Wiltshire Core Strategy Habitats Regulations Assessment (Wiltshire Council, February 2014)

²³ Update to the Wiltshire Core Strategy Habitats Regulations Assessment (Wiltshire Council, February 2014)

Management Strategy would continue ensure that this additional housing would have no adverse effect upon site integrity’.

- 3.20.5 It is considered that the additional housing growth proposed will not lead to further significant adverse effects that have not already been predicted in the SA Report. Further effects are likely to occur at a local level, and be specific to individual sites, but are considered capable of being mitigated. The SA Report has suggested potential mitigation measures that could reduce impacts for all significant effects highlighted.

3.21 Core Policy 32 – Spatial Strategy: Westbury community area

- 3.21.1 It is proposed that an additional 210 dwellings will be required in Westbury town over the Plan period and an additional 15 dwellings in the rest of the community area.

- 3.21.2 The Core Strategy SA Report stated that the previously proposed level of growth was a reduction in housing growth compared to historic trends and that there are few environmental constraints to development in and around Westbury. The proposed increase in housing will help to meet housing need in Westbury and the wider area and lead to a number of other social and economic benefits, as highlighted in the SA.

- 3.21.3 It was suggested that the main sustainability issue of the previously proposed level of housing related to traffic and air quality and it is likely that further growth will have greater impacts on this issue unless mitigation measures are put in place. This is not considered to be an issue that will prevent future development in Westbury and possible mitigation is likely to be in the form of measures to encourage sustainable forms of transport and location of development that allows walking and cycling to the town centre.

- 3.21.4 The SHLAA indicates that there are sustainable sites for potential development in and around Westbury. It is considered that the additional housing growth proposed will not lead to further significant adverse effects that have not already been predicted in the SA Report. Further effects are likely to occur at a local level, and be specific to individual sites, but are considered capable of being mitigated.

- 3.21.5 The Wiltshire Core Strategy HRA²⁴ has confirmed that *‘additional housing in this area could potentially put additional pressure upon the Bath and Bradford on Avon Bats SAC through habitat and roost loss, although this would be dependent upon the detailed location and design of the development. Core Policy 50 and the Wiltshire Bats SAC guidance would continue to provide an effective mechanism to ensure that this additional housing would have no adverse effect upon site integrity. Additional housing will further increase recreational pressure upon Salisbury Plain SPA in combination with other community area policies in the plan. Core Policy 50 and the Salisbury Plain Management Strategy would continue to ensure that this additional housing would have no adverse effect upon site integrity’.*

²⁴ Update to the Wiltshire Core Strategy Habitats Regulations Assessment (Wiltshire Council, February 2014)

3.22 Core Policy 33 – Spatial Strategy: Wilton community area

- 3.22.1 The spatial strategy for the Wilton community area was adopted as part of the South Wiltshire Core Strategy in February 2012. This spatial strategy was carried forward into the submission version of the Wiltshire Core Strategy and no amendments were made. The Core Strategy SA Report states that, because the original strategy had not been amended, and was adopted, no further sustainability appraisal work was required.
- 3.22.2 No further development is proposed in Wilton town (that is considered as part of the Salisbury strategy). The adopted South Wiltshire Core Strategy has provided certainty on what new housing sites should be developed. The Strategy, adopted in 2012, identifies a significant increase in land available for development particularly at Salisbury and Wilton. However rates of house building have not increased markedly from the trend of several years past and have failed to match plan expectations. Allocations and deliverable supply ensure a good range of land opportunities to developers.
- 3.22.3 A further 35 dwellings are proposed in the rest of the community area which could cumulatively impact on the landscape qualities of the Cranborne Chase and West Wiltshire Downs AONB, together with that already proposed in the Core Strategy. However, the relatively modest increase over the life of the plan, which equates to approximately 3 additional dwellings per year is not thought likely to be significant. The exact nature of effects will depend on the nature and location of future development and this cannot be assessed at this stage.
- 3.22.4 The SA considers that the increase of 35 dwellings can be accommodated in this community area without significant impacts but that very careful consideration should be given to the location of future sites to avoid adversely impacting on the AONB and its setting. As well as careful consideration of location, other mitigation measures such as the design and layout of development can help avoid impacts on the special quality of the designated landscape, and that reference should be made to the AONB Management Plan. All proposed development should be accompanied by a landscape assessment that shows evidence that the proposals will not adversely affect the AONB or its setting.

3.23 Core Policy 43 – Providing affordable homes

- 3.23.1 The submitted version of the Core Strategy included a requirement within CP43 for 40% affordable housing provision on sites of 5 or more dwellings, with sites of 4 dwellings or fewer required to provide a financial contribution.
- 3.23.2 The Core Strategy SA Report assessed a number of options as follows:

Option 1 - Retain the current policies saved within the extant Wiltshire District Local Plans.

Option 2 - Adopt an ambitious policy approach which seeks a considerable step change in the level of provision across the plan period – prioritising the provision of affordable homes.

Option 3 (Core Strategy proposed approach) - Implement a consistent policy approach across Wiltshire, which seeks to secure a level of provision, which enables the delivery of affordable housing alongside other objectives contained within the strategy.

- 3.23.3 It concluded that Option 3 was likely to lead to greater benefits in terms of overall housing provision and affordable provision than the other two options. It was noted in paragraph 5.45.16 that the key adverse effect associated with a 40% requirement was likely to relate to viability and profitability for developers, potentially reducing the overall numbers of new homes being built in the long-term because some developments may be unviable. However, the recommendation of the Affordable Housing Viability Assessment Draft Report²⁵ had been that the Council consider the adoption of a single affordable housing target of 40% for all sites of 5 units and above and CP43 maintained a degree of flexibility by suggesting that provision may vary on a site-by-site basis to take account of viability concerns.
- 3.23.4 In his 10th procedural letter to the Council, the Core Strategy Inspector acknowledged that the *'evidence indicates a considerable need for various forms of affordable housing throughout Wiltshire.'* However, he continued that *'...whilst I recognise a considerable need for such housing, I am concerned that the figure of 40% is not justified adequately by the evidence base, particularly the Affordable Housing Viability Assessment²⁶'*. The Inspector advised *'it may be necessary for the Council to revise [the viability assessment] to look at alternatives which will be clearly viable in a more comprehensive range of circumstances so that the objectives of the CS may be fulfilled'*.
- 3.23.5 The Council has subsequently appointed HDH Planning and Development to undertake an assessment²⁷ of the cumulative impact on development viability, of the policies in the Core Strategy, to ensure that the level of affordable housing and other policy requirements are appropriate, and that the policies in the Plan imposed on developers do not generally render development unviable, as required by paragraphs 173 and 174 of the National Planning Policy Framework (NPPF).
- 3.23.6 The Local Plan Viability Study²⁸ reflects the proposed charging areas set out in the Council's Draft CIL Charging Schedule²⁹, as follows:

Residential vales used in CIL Viability Study		
Settlement category	Average value (£/sq ft)	Average value (£/sqm)
Category 1 Marlborough & surrounding area, including Pewsey	306	3294
Category 2 Bradford upon Avon, Salisbury, rural villages south of Salisbury, Wilton and Chippenham	246	2648
Category 3 Corsham, Amesbury, Devizes and surrounding villages	215	2314
Category 4 Melksham, Trowbridge, Westbury, Dilton Marsh, Calne, Warminster, Tisbury and Mere	196	2110

Source: Table 4.2.1 Community Infrastructure Levy: Viability Study (BNP Parabas Real Estate, November 2013).

²⁵ Affordable Housing Viability Assessment Draft Report (Adams Integra, December 2011)

²⁶ See 12.

²⁷ Local Plan Viability Study (HDH Planning and Development, February 2014)

²⁸ See 14.

²⁹ Wiltshire Community Infrastructure Levy Draft Charging Schedule (Wiltshire Council, January 2014)

3.23.7 The Local Plan Viability Study recommends that:

- all development sites in the Category 1 and Category 2 areas are viable and able to bear the costs of affordable housing at 40% and CIL, as well as the wider policy burdens
- the Council give consideration to reducing the Affordable Housing Requirement to 30% in the Category 3 and 4 areas

3.23.8 Taking into account these recommendations, a number of reasonable approaches could still be considered, as follows:

Option 1 – Continue to adopt a single affordable housing policy requirement across the whole of the plan area and continue to require a financial contribution for developments of 4 dwellings or fewer

Option 2 - Adopt a geographical policy requirement reflecting different value areas across the plan area, as evidenced in the Local Plan Viability Study. This is the Council’s proposed approach and is based on geographic disparities across the county in terms of residual land values. Two separate affordable housing zones are proposed as follows:

40% affordable housing zone	Marlborough & surrounding area, Pewsey, Bradford on Avon, Salisbury, rural villages south of Salisbury, Wilton and Chippenham
30% affordable housing zone	Corsham, Amesbury, Devizes and surrounding villages, Melksham, Trowbridge, Westbury, Dilton Marsh, Calne, Warminster, Tisbury and Mere

This option has regard to the practicalities of provision on small sites. While developments of 5 units and above will be expected to make provision on-site, on sites of 4 dwellings or fewer, no affordable housing contribution will be sought. The provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need, mix of affordable housing proposed and where appropriate, the viability of the development.

Option 3 - Adopt a policy approach which assesses the viability of development to determine an acceptable rate of affordable housing delivery on a site-by-site basis.

Discussion

3.23.9 The Core Strategy SA Report states that the affordable housing Core Policy 43 is unlikely to have significant effects with regards the environmental sustainability objectives because of its specific nature. Other policies in the Core Strategy that control housing numbers and the location of those houses are more likely to adversely impact on those objectives and that has been highlighted in different parts of the SA Report. The proposed amendments to Core Policy 43 are not considered likely to change this position.

3.23.10 The previous option considered of requiring an ambitious approach which seeks a considerable step-change in affordable provision was thought likely to lead to significant adverse effects, leading to serious viability implications for developers and which could result

in the affordable housing and market housing elements of development both being lost. This option is not now being considered.

- 3.23.11 From considering the evidence presented in the Local Plan Viability Study³⁰, it seems reasonable to propose a two-tier approach to affordable housing provision when there are considerable disparities across the county in terms of residual land values. The Study states that all development sites in the Category 1 and Category 2 areas are viable and able to bear the costs of affordable housing and CIL, as well as the wider policy burdens.
- 3.23.12 However, the Study states that the larger sites in the Category 3 area are not able to bear the 40% affordable housing requirement when combined with the proposed rates of CIL. With 35% affordable housing, the residual value is in excess of the viability threshold – but only by a small margin. In the Category 4 area, several of the modelled sites are not viable, even without any affordable housing. On the remaining sites the tipping point is generally between 25% and 35%. The assessment recognises that from the Council's affordable housing track record that most sites in this area are delivering affordable housing at 30%.
- 3.23.13 This would suggest that a blanket approach, as under Option 1, is not the most effective or sustainable approach to maximising affordable housing provision. Comments made by the Core Strategy Inspector suggest that a 40% requirement across the whole county would put too much of a burden on developers in the current economic climate, making some developments unviable. This possibility is highlighted in the SA Report at paragraph 5.45.16 although it recognised the flexibility offered by CP43 which states '*...the provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need, mix of affordable housing proposed and where appropriate, the viability of the development*'. Setting a lower single requirement across the county of say 30% would improve viability everywhere but not maximise affordable provision in higher value areas which would under-provide; it could be argued that these higher value areas are where affordability issues are most acute.
- 3.23.14 It is considered that, taking into account the up-to-date evidence contained within the Viability Study, and the Inspector's comments, there would still be benefits from this approach in terms of affordable housing provision and housing provision generally and other social and economic benefits that go along with that, but these benefits are unlikely to be significant. Depending on the level set, there is always likely to be issues either of under provision or viability.
- 3.23.15 Option 3, as another alternative approach outlined in para 3.23.8, would introduce a greater flexibility but is not likely to maximise affordable housing provision. It would be resource-intensive for the Council to negotiate every single application, ineffective and would not give certainty to the market. The amended policy Core Policy 43 allows for negotiation on a site-by-site basis where there is evidence that the requirement would make a development unviable and further flexibility is introduced in the supporting text to the policy which states '*the need for and type of affordable housing will be reviewed regularly throughout the plan period...and revised targets will be determined depending on the prevailing housing need and market conditions at the time...*'.

³⁰ Local Plan Viability Study (HDH Planning and Development, February 2014)

- 3.23.16 It is not considered likely that the three approaches discussed above will lead to significant adverse effects against any of the SA objectives. However, this policy should be closely monitored for its effects on housing provision and regularly reviewed with regards current economic climate and market conditions.
- 3.23.17 The Council is proposing a two-tier approach which they consider will bring certainty to the market and will enable adequate affordable homes to be delivered across the whole of the plan area. Additionally, it is felt this policy approach will secure additional affordable homes at higher value areas dependent on the viability differential. The SA considers that this approach is most likely to lead to greater sustainability outcomes out of the three reasonable alternatives outlined above.
- 3.23.18 The removal of the requirement for a financial contribution towards affordable housing on sites of four dwellings or fewer is not considered likely to have detrimental effects on affordable housing provision. It is likely that current contributions from small developments of 4 dwellings or fewer are relatively small and would only provide a relatively low number of affordable dwellings. It is the larger developments that provide the vast majority of affordable dwellings. The Viability Study, at paragraph 10.49, also suggests that '*many of the smaller sites are built out by smaller builders who do not have the resources, experience and expertise to deliver affordable housing on-site or pay a financial contribution. The result can be that they are deterred by the 'hassle factor'. There is some anecdotal evidence that where affordable housing thresholds are reduced that, regardless of the viability, the delivery of smaller sites is adversely impacted*'.
- 3.23.19 Options 1 and 3 are not proposed to be taken forward by the Council. Option 1 is considered to be too inflexible and would either lead to under-provision if the level is set too low and viability issues if set too high. Option 3 would possibly be too flexible and resource-intensive, would not give certainty to the market and would make it difficult for the Council to plan for the level and location of new affordable homes.

3.24 Core Policy 47 - Meeting the needs of Gypsies and Travellers

- 3.24.1 The Core Strategy SA Report assesses a number of reasonable alternatives to Core Policy 47, presented in Section 5.49 of that document. It found that the previously proposed provision figures would be likely to lead to significant benefits in terms of meeting the permanent and transit pitch requirements of the Gypsy and Traveller community, and those needs of Travelling Showpeople, and there would also be significant benefits with regards social inclusion and cohesion.
- 3.24.2 As a result of correspondence³¹ from the Core Strategy Inspector, Wiltshire Council has produced an addendum to Topic Paper 16: Gypsies and Travellers and revised CP47. The revised policy is as follows:

'Provision should be made for 106 permanent pitches for Gypsies and Travellers, 25 transit pitches and 5 plots for Travelling Showpeople during the period 2011 to 2021. Permanent and transit pitches should be distributed and phased as follows:

³¹ 10th procedural letter dated 2 December 2013 (EXAM/75) and 11th procedural letter dated 23 December 2013 (EXAM/77)

Housing Market Area	Proposed requirement 2011-2016	Proposed requirement 2016-2021	Transit provision 2011-2021
North and West Wiltshire	26	22	10
South Wiltshire	37	19	8
East Wiltshire	3	1	7
Total	66	40	25

- 3.24.3 The revised policy is requiring an additional 24 permanent pitches 2011-2021, the majority of which are in the North and West Wiltshire HMA. Transit pitches and plots for Travelling Showpeople are proposed to stay the same.
- 3.24.4 It is considered that this increase in pitch and plot provision is not likely to lead to additional significant effects that have not already been highlighted, against the SA objectives. As has been noted in the SA Report, impacts are likely to be at a local level and details of sites are not known. Para 5.49.5 of the SA Report states *'the assessment has noted that the allocation of Gypsy and Traveller sites has the potential for a range of impacts on the environmental sustainability objectives...and that the more sites that are allocated the more likelihood of impacts in some locations, with the possibility of adverse cumulative effects if some sites are located in the same area'*. However, if future sites are allocated in sustainable locations, meeting the proposed criteria in Core Policy 47 and other policies within the Core Strategy and in the NPPF, the numbers under consideration are not likely to cause significant concerns.
- 3.24.5 Actual sites are not allocated in Core Policy 47 and therefore it is not possible to ascertain the impacts of individual sites or the cumulative effects of different sites. The likely effects of any future proposed sites will be established in the SA Report produced alongside the forthcoming Gypsy and Traveller DPD which is scheduled in the Local Development Scheme (LDS) to be adopted May 2016. This will be informed by an updated Gypsy and Traveller Accommodation Needs Assessment (GTAA).
- 3.24.6 It is considered that the benefits of meeting the accommodation needs of these groups will be significant and that further work to establish what this need is and how it can be met will allow for these benefits to be increased further.
- 3.24.7 It is considered that the revisions proposed to Core Policy 47, and the increase in pitch provision in particular, is sustainable over the plan period and that there are likely to be sustainable locations to meet these requirements. Further detail of site locations and how future provision will be made will be presented in the forthcoming Gypsy & Traveller DPD which will be informed by its own SA.