



Wiltshire Local Plan

Planning for Bradford on Avon

September 2023

Wiltshire Council

1. Introduction

1. 'Planning for Bradford on Avon is a guide as to how the Local Plan Review, 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 Local Plan that relate to Bradford on Avon, as follows:

Table 1 Wiltshire Local Plan policies for Bradford on Avon

Policy	Title
57	Bradford on Avon

2. A table containing the Wiltshire Core Strategy policies and saved planning policies for Bradford on Avon that have been reviewed through the Local Plan Review is included at Appendix 1, together with an explanation of whether they have been deleted or revised. The review of the Wiltshire Core Strategy and saved planning policies has been undertaken to ensure the Local Plan is consistent with up-to-date national planning policy, can continue to support delivery of sustainable development and can effectively inform planning decisions in Wiltshire over the new Local Plan period.
3. The Local 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 Local Plan also sets a scale of growth, as part of a wider spatial strategy for Wiltshire, by which the town will expand over the Local Plan period (2020-2038). This is expressed in additional homes. In Bradford on Avon, while no new land is allocated for development within the Plan, a reserve housing site is identified that can be drawn upon should it be needed. This document explains the context and rationale for these decisions.
4. The document summarises what growth has taken place recently, what protections and constraints upon growth will continue and what is already set to take place. It sets out local priorities moving forward into the new plan period. Shaping the town's future, to help deliver these priorities, this document explains what role growth will play; the direction for the town centre; and how the Local Plan supports the services and facilities the community requires. Altogether, it tells how the Local 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 Local Plan. It pulls together the comments and advice received from, amongst others, local residents, landowners, business and service providers who also influenced the Local Plan content through consultation.

2. Bradford on Avon - Context and challenges

Table 2 Strategic context for Bradford on Avon Market Town

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.

- Figure 1 below shows the settlement of Bradford on Avon along with the key environmental constraints at the settlement.

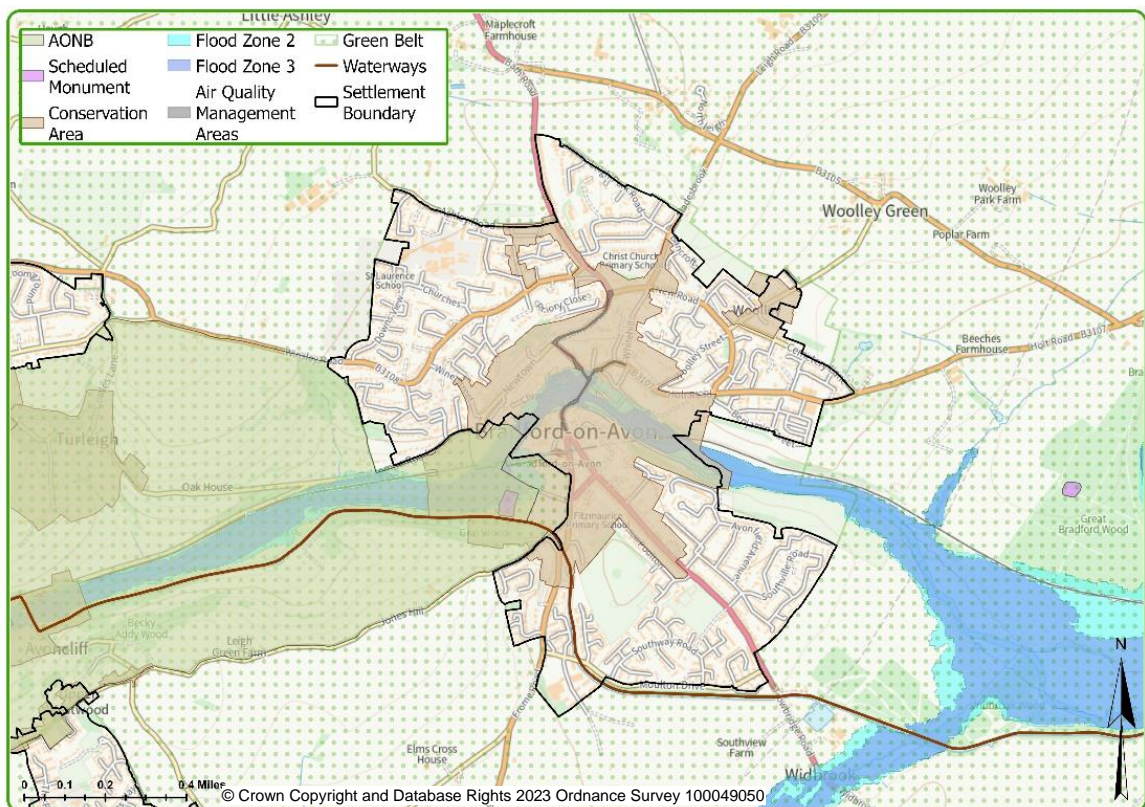


Figure 1. Environmental constraints and designations in Bradford on Avon

¹Census 2021, ONS, available at: <https://www.ons.gov.uk/visualisations/customprofiles/draw/>

7. The town is surrounded by Green Belt, 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, any expansion of the settlement must conserve the landscape and scenic beauty and give protection to bats species.
8. The River Avon flows through the centre of the town, alongside the Kennet and Avon Canal and is a popular tourist destination.
9. 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.
10. The town currently offers a low range and number of employment opportunities and has a high level of out-commuting.
11. 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.
12. 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?

13. 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.

14. The following diagram shows how much housing has been delivered in Bradford on Avon from 2006 to 2022 compared to annual rates in the Wiltshire Core Strategy.

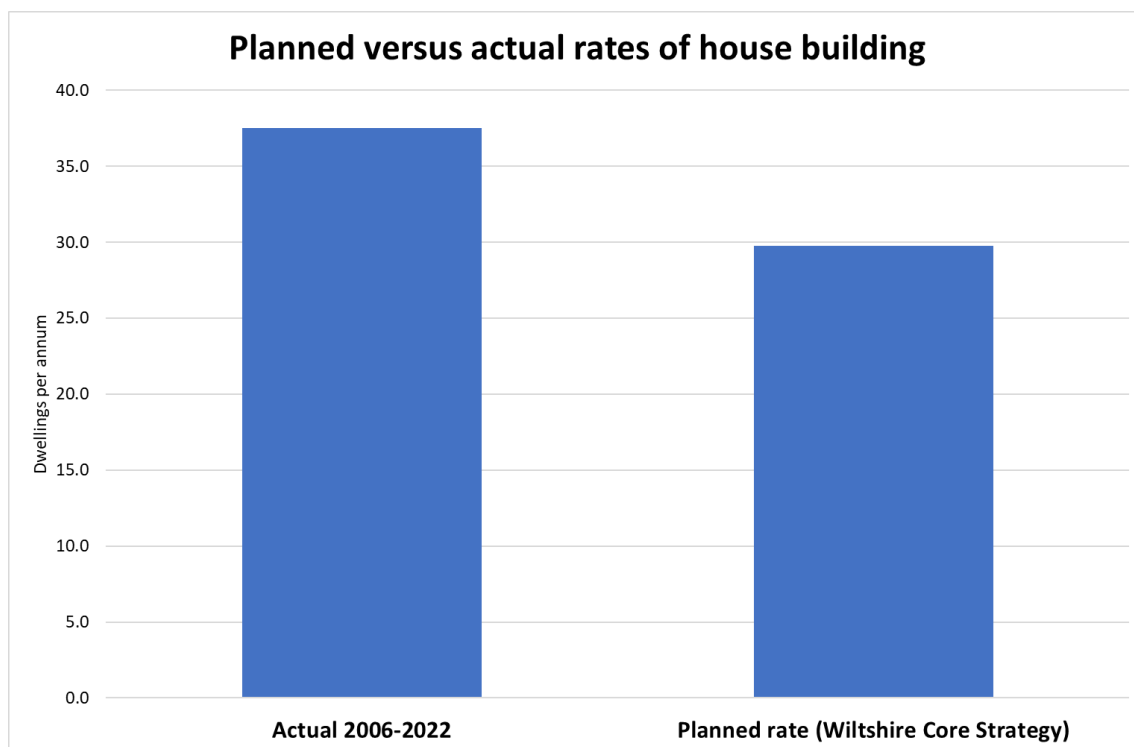


Figure 2. Planned growth versus actual rates of house building in Bradford on Avon

15. 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.
16. 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. The Principal Employment Area at the town, as shown on Figure 3, at Treenwood and Elm Cross Industrial Estate continue to have a role.

17. 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.
18. 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.
19. 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.
20. 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.
21. 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.
22. 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)

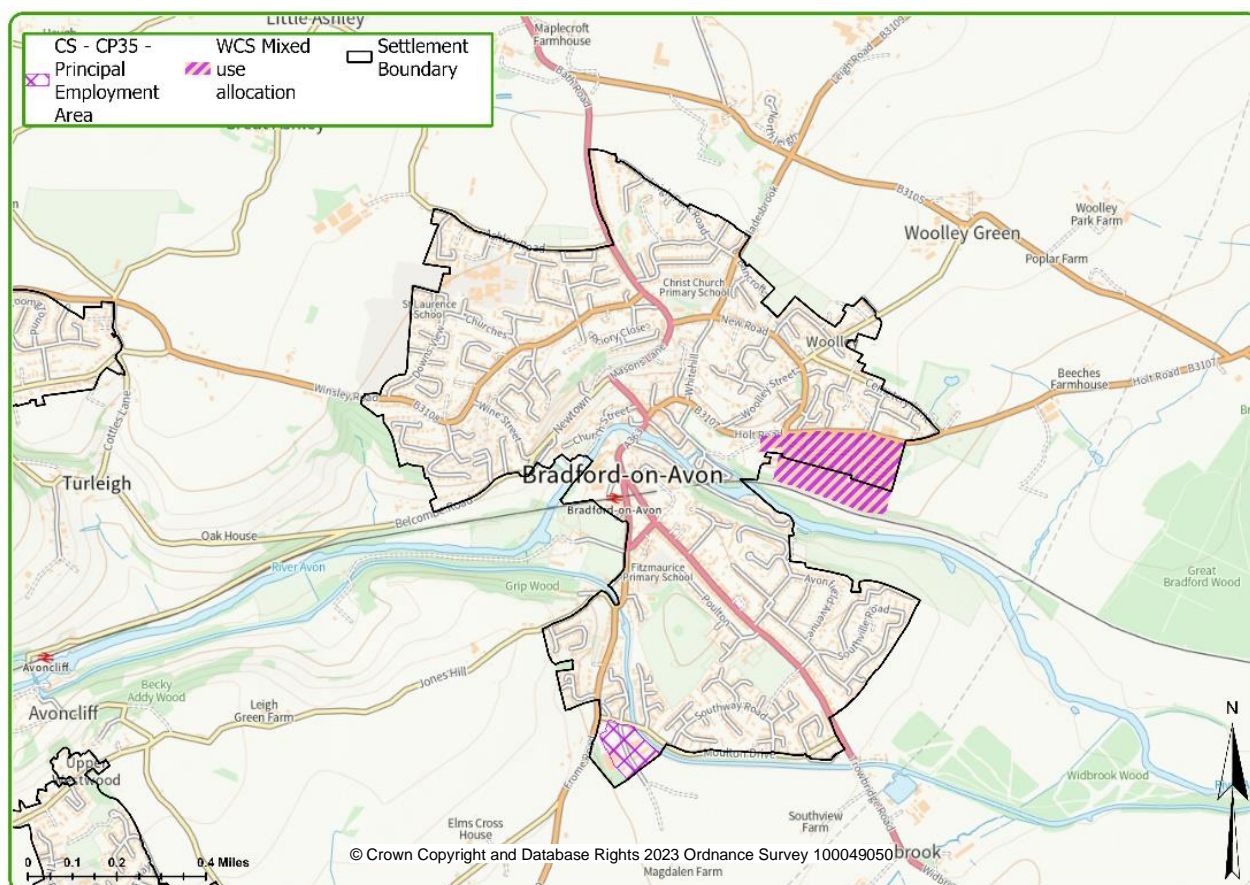


Figure 3. Existing development plan allocations and major planning permissions at Bradford on Avon

Planning to 2038

23. 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 constrained in environmental terms by the position of the Green Belt 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.

24. 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:

Table 3: Place Shaping Priorities, Bradford on Avon

<p>PLACE SHAPING PRIORITIES (PSP)</p> <p>PSP 1 Employment: Delivery of employment growth and retention of all existing employment sites.</p> <p>PSP 2 Affordable Housing: Provision of affordable housing to help reduce high levels of need in the town.</p> <p>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.</p> <p>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.</p> <p>PSP 5 Walking and Cycling: Improve the pedestrian and cyclist environment through and around the town.</p> <p>PSP 6 Design: Achieve high quality design in new buildings and the public realm that respects and responds to its context.</p> <p>PSP 7 Climate: Addressing the climate emergency and enhancing biodiversity, using multifunctioning techniques such as natural flood controls e.g., flood plains.</p>

25. 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 within the Local Plan for Bradford on Avon that guides development and the direction of growth (Policy 57).
26. 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 harmony.
27. PSPs are also used to influence how and 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.

- 28. 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.
- 29. The new strategy identifies a requirement of 140 homes for the Local Plan period 2020 to 2038. A decrease in rates of house building, compared to the Wiltshire Core Strategy, is justified moving forwards. How this requirement can be met is set out in the next section.



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

- 30. The modest level of 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.
- 31. Improvements to footpaths, cycleways and public transport can be provided in conjunction with development. Growth can be guided to ensure continued

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

investment in the town centre. This would accord with PSPs 3 and 5 (above) that seek these outcomes.

32. The evidence⁴ suggests there will not be strong demand to develop additional retail floorspace but to refurbish and re-purpose existing retail instead.

3. Local Plan Proposals

Protecting the environment

33. Bradford on Avon is surrounded by Green Belt and consideration must also be given to the colonies of bats, relating to the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). These present significant environmental constraints to the outward expansion of the town. The Local 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.
34. Careful consideration needs to be given to the potential impacts of any new development on traffic congestion within the town due to the Air Quality Management Area. Future potential development sites that 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, will help address environmental concerns.

How many more homes?

35. From the reduced scale of growth over the Local Plan period (140 homes) 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.
36. At constrained settlements, such as Bradford-on-Avon, a contribution of homes from small sites is factored in to help minimise the level of greenfield land allocated and ensure it is only allocated where it is essential to do so⁵. The level for Bradford-on-Avon is 80 homes and means that no allocations are identified for the town. However, provision is made for a reserve site, which is explained further below.

⁴ Wiltshire Retail and Town Centres Study (Avison Young, 2020)

⁵ Wiltshire Local Plan Housing Delivery Paper, September 2023

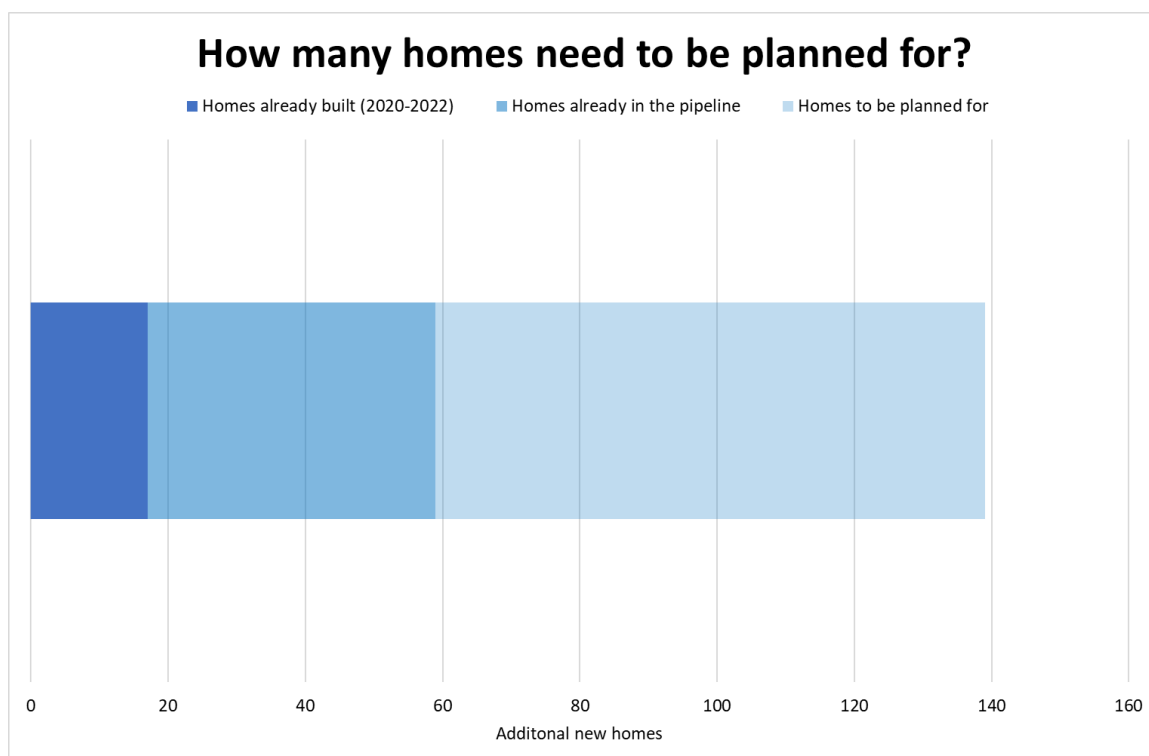


Figure 5. Calculating how many homes need to be planned for in Bradford on Avon

How much employment land?

37. There is little evidence of demand for new employment sites. The Employment Land Review concludes that there are no available sites in Bradford on Avon, but there are sites at Trowbridge and Westbury that can accommodate the forecast demand for employment land in this cluster of towns⁶. For Bradford on Avon, there is a small indicative demand for 0.4-1.0 ha for offices and 0.1ha for industrial uses⁷ which can be accommodated.

Selecting sites

38. While there is no residual requirement to be met at Bradford on Avon, consideration has been given to the identification of a reserve site. The supporting Site Selection Methodology⁸ sets out the process that was undertaken to select preferred sites. Appendix 2 outlines the detailed outcomes from this process for Bradford on Avon and is briefly summarised below.

⁶ Wiltshire Employment Land Review, paragraph 7.1.12 (Hardisty Jones Associates, 2023)

⁷ Wiltshire Employment Land Review, Figure 6.10 Indicative demand at main settlements and the rest of the Functional Economic Market Area (Hardisty Jones Associates, 2023)

⁸ Wiltshire Local Plan Site Selection Methodology, September 2023

39. The starting point for assessing sites is Wiltshire Council's Strategic Housing and Economic Land Availability Assessment⁹ (SHELAA), which is a register of land promoted for development by landowners and prospective developers. Only sites that were not spatially separated from the built-up edge were considered. Stage 1 of the site selection process carried out an initial review to remove sites from further consideration that were known to be unavailable or unsuitable, for example by being already built out or being entirely within an overriding constrained area, such as a flood zone. The assessment of sites at Stage 1 is listed in Table 7 within Appendix 2. The majority of SHELAA sites were removed at Stage 1 in Bradford on Avon because they are located within the Green Belt.
40. Stage 2 involved a high-level assessment of the suitability of each remaining site, based on a range of criteria, including potential for landscape impacts, heritage impacts and accessibility. Sites were excluded from further consideration at Stage 2 where it was judged likely that there would be significant likelihood of harm resulting from development of a site. One site, Land adjacent to Holt Road, was excluded from further consideration through Stage 2, on landscape and heritage grounds. The site is a rear garden of an existing house in a Conservation Area which 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. The details of Stage 2 are set out in Table 11 within Appendix 2.
41. There were two sites which were considered to be suitable for further consideration and assessed as 'reasonable alternatives' for development to be assessed through Stage 3 of the site assessment – the sustainability appraisal (See Figure 6 below).

⁹ Information about the [Strategic Housing and Employment Land Availability Assessment](#) can be found on the Council website.

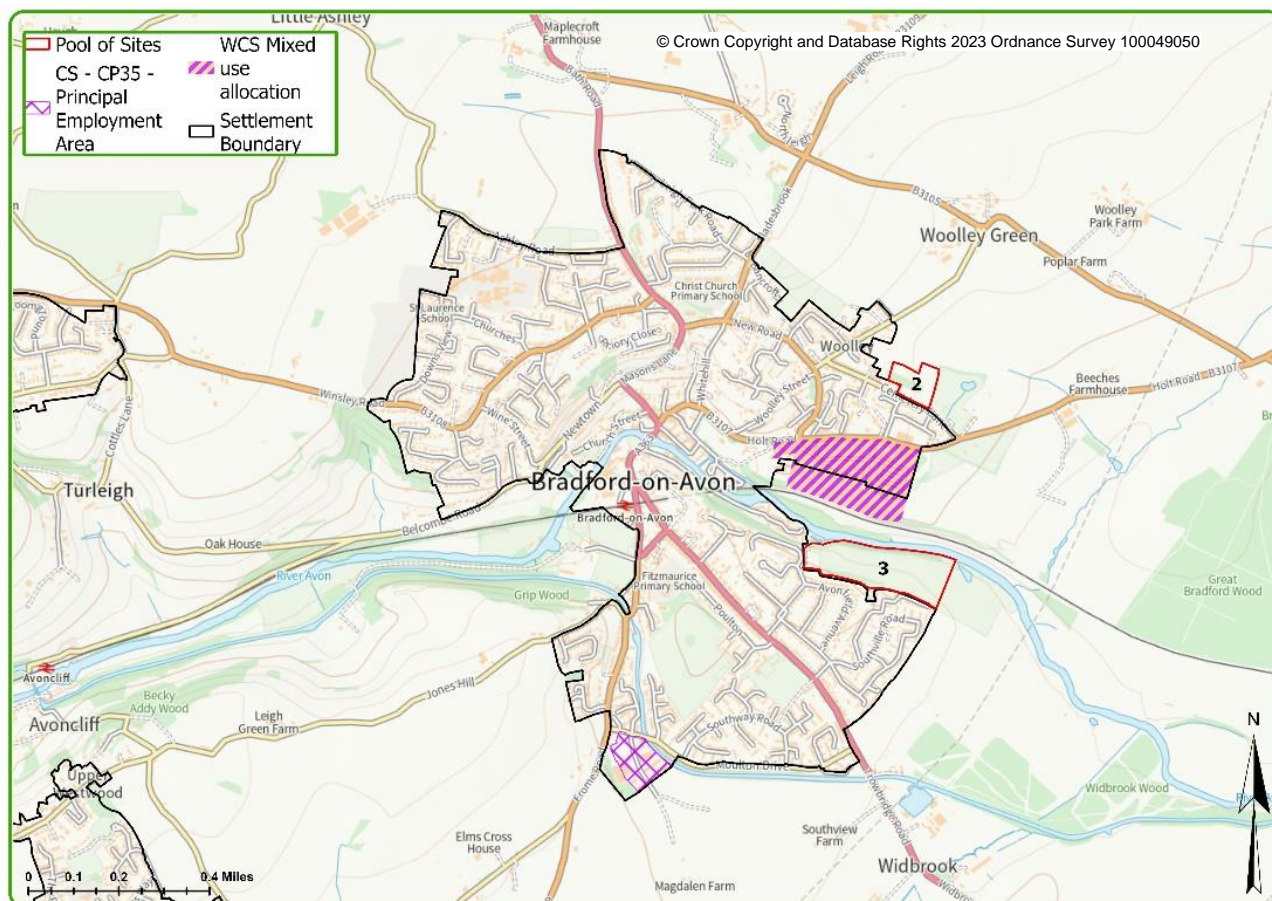


Figure 6. The pool of sites for sustainability appraisal at Bradford on Avon

42. These sites resulted from a two-stage sifting process that removed land incapable of being developed without unacceptable impacts. Sustainability appraisal then assessed 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. The sustainability appraisal showed that both sites had a range of negative environmental effects.
43. A summary of the outcomes from the sustainability appraisal for each site can be found in Table 11 and Table 12 within Appendix 2.
44. 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. Both sites were ranked equally through the sustainability appraisal.

45. However, the sustainability appraisal concluded that development of Site 2 was likely to lead to a major adverse effect 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.
46. Based on this evidence Site 2 was removed from further assessment at Stage 3 of the process.
47. The outcomes from the sustainability appraisal, as shown in Table 11 and Table 12 within Appendix 2, show that Site 3 was the only sustainable site from those that were assessed because on biodiversity grounds Site 2 was removed. The full sustainability appraisal assessments are contained with a separate report¹⁰.
48. Following assessment through the sustainability appraisal, the remaining site was assessed by its performance against the Place Shaping Priorities, to determine the degree to which the site could contribute towards achieving the outcomes identified as priorities for the towns – through Stage 4 of the site selection process. The results from this stage of the assessment are shown in Table 13 within Appendix 2.
49. 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.

¹⁰ Wiltshire Local Plan Review Sustainability Appraisal Report (Wiltshire Council, September 2023)

50. The methodology and detailed assessments made in the site selection process are all explained in Appendix 2. The sustainability appraisal process, and its results, are contained within the full Sustainability Appraisal report¹¹

What development is proposed?

51. The Local 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.
52. At Bradford on Avon, the main constraint to outward urban expansion is the West Wiltshire 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

53. 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 and they are required to maintain the land supply requirements set by national policy.
54. Policy 3 of the Local Plan sets out precisely, in what circumstances and under what conditions, a reserve site may be supported.
55. At Bradford on Avon, Site 3 Land at Former Golf Club is identified as a reserve site for approximately 120 homes.
56. 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.
57. 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 proposals of the Local Plan Review. Currently the Town Council are looking at whether to review the adopted Neighbourhood Plan for Bradford on Avon.

¹¹ Wiltshire Local Plan Review Sustainability Appraisal Report (Wiltshire Council, September 2023)

Supporting the town centre

58. 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 Local Plan period.
59. Policy 68 (Managing Town Centres) and Appendix 5 of the Local Plan defines a hierarchy of town centres and the extent of town centres and primary shopping areas. 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.
60. 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.
61. 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 Policies Map.
62. 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 Local 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.
63. The Wiltshire Retail and Town Centres Study (WRTCS)¹² 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 and will form a key

¹² Wiltshire Retail and Town Centres Study (Avison Young, 2020)

consideration for any proposals for new food stores. There could be potential to grow the food and beverage market over the Local Plan period.

64. 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.
65. 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.
66. The WRTCS 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?

67. Landowners, business and housebuilders are the main drivers of development over the Local 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

68. 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.

69. 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.
70. 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 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.
71. 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 hectare¹³.
 - 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.
72. 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

¹³ National Planning Policy Framework (2021), Paragraph 69, MHCLG

brownfield sites or land within the built edges of the settlement where potential impacts on the historic environment are likely to be reduced.

73. There are no other Local Service Centres or Larges Villages within the Bradford on Avon designated neighbourhood area (parish boundary) that have their own separate indicative rural housing requirements¹⁴. Ten per cent of the scale of growth suggests a baseline requirement of around 15 dwellings.
74. 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.

Table 5: Neighbourhood Plan area requirement

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

75. 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 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, what additional provision is necessary to support growth and what other opportunities there may be.

Education

76. 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. There are currently only a small number of available early years places and options are being investigated for new provision.

¹⁴ Neighbourhood area requirements for the rural parishes are calculated separately, as set out within the Rural Housing Requirements 2023, Wiltshire Council paper

Sustainable transport

77. 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.
78. 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.
79. 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.
80. 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.
 - 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.
81. Current opportunities are:
 - 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

82. 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

83. 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.
84. 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.
85. 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.
86. The approach to securing infrastructure provision from new development is set out within Local Plan Policy 5 (Securing Infrastructure Provision from New Development), with site specific requirements that are applicable to Bradford on Avon set out within Policy 57 (Bradford on Avon Market Town).

Appendix 1 Policy Review

Table 6: Wiltshire Core Strategy policy review for Bradford on Avon policies

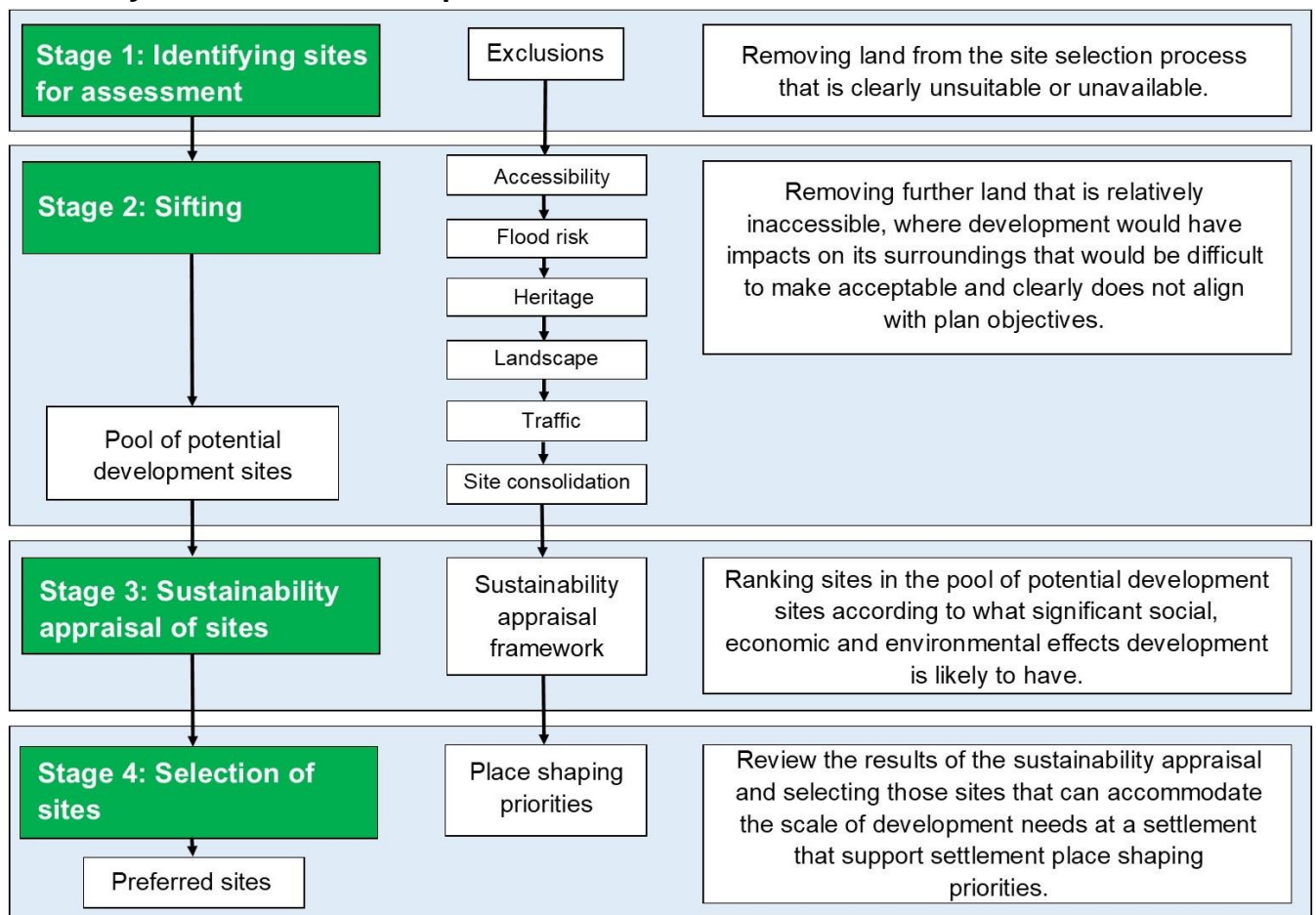
Policy	Title	Retained, Replaced or Deleted
<i>Wiltshire Core Strategy (WCS)</i>		
WCS Core Policy 7	Spatial Strategy for Bradford on Avon Community Area. Principal Employment Areas: Treenwood Industrial Estate and Elm Cross Trading Estate.	Deleted and Replaced with Policy 57 Bradford on Avon. This policy sets out how development at Bradford on Avon is envisaged to take place over the plan period. This includes outlining the amount of growth provided at Bradford on Avon and the Principal Employment Areas.
West Wiltshire District Plan Policy R10	Poulton Field, Bradford on Avon.	Deleted and Replaced by Policy 84 Open Space. Policy 84 replaces previous public open space standards set within 'saved' policies of the old District Local Plans.
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.	Policy deleted as new police station has now been built.

Appendix 2 Site Selection

Site Selection: Bradford on Avon

- A1. The purpose of this appendix is to explain the site selection process at Bradford on Avon, which has taken place over four stages, as illustrated in the flow diagram below. The full methodology can be found in the supporting Site Selection Methodology report¹⁵.
- A2. This appendix briefly describes the methodology, and explains the outputs that emerge from Stages 1-4, with the conclusions for Bradford on Avon set out within the main body of this paper.

Summary of the site selection process



¹⁵ Wiltshire Local Plan Site Selection Methodology, September 2023

Strategic Housing and Employment Land Availability Assessment

- A3. The Strategic Housing and Economic Land Availability Assessment¹⁶ (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 plans¹⁷. Plan preparation, and not the SHELAA, determines what land is suitable for development, through a process of selecting the most appropriate sites.
- A4. 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.

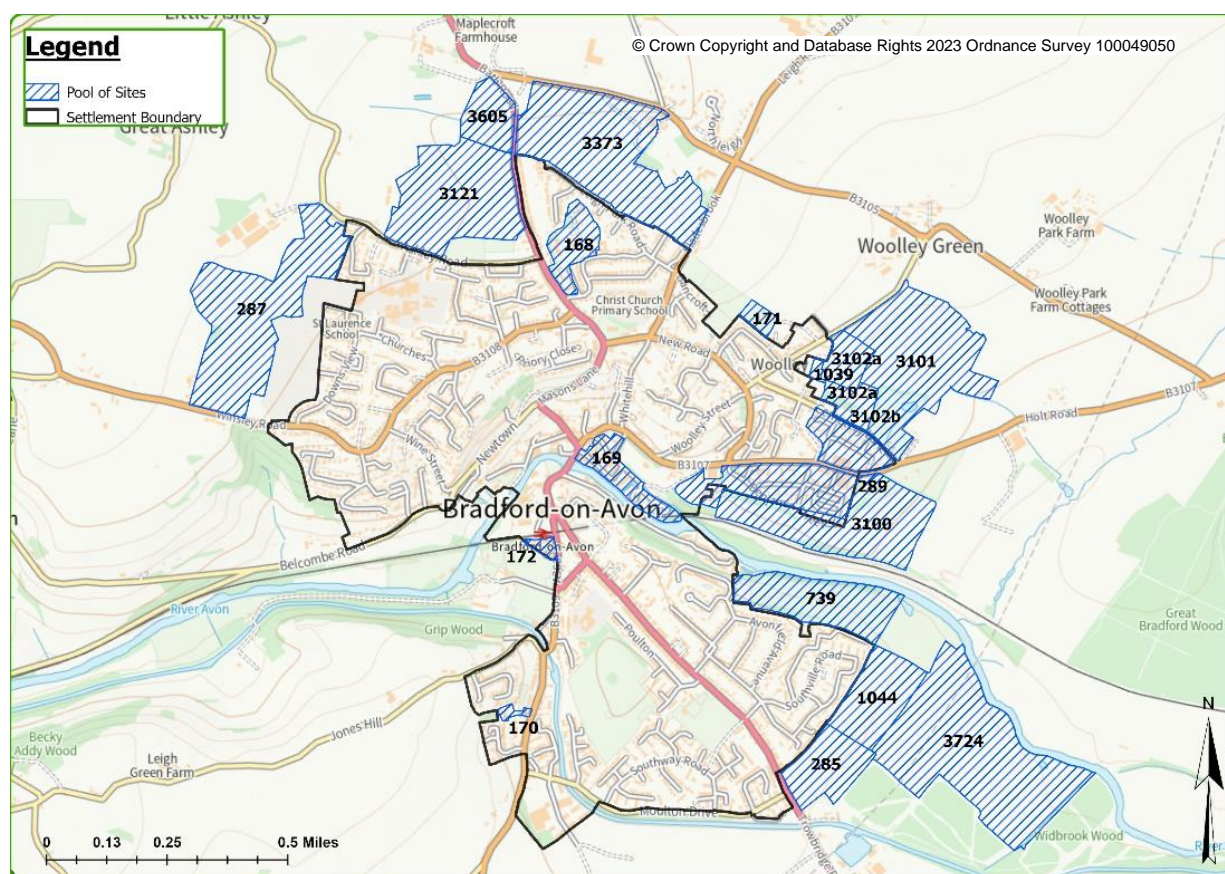


Figure 7. Pool of sites at Bradford on Avon

¹⁶ The Wiltshire Council Strategic Housing and Economic Land Availability Assessment (SHELAA) is available from the council’s website. The SHELAA was last formally published in 2017, but new sites submitted to the council since then have also been considered through site selection.

¹⁷ 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 Local Plan period.

A5. The following paragraphs summarise the stages of assessment undertaken through the site selection process.

Stage 1 – Identifying Sites for Assessment

A6. 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.

A7. Nine sites at Bradford on Avon were excluded at Stage 1.

Table 7: Sites removed at Stage 1 of the site selection process for Bradford on Avon

SHELAA site ref.	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 Green Belt. Unavailable.
287	Land within the Green Belt. Unavailable.
289	Site comprises land already built out for residential and employment. Unavailable.
1044	Land within the Green Belt. Unavailable.
3100	Land within the Green Belt. Unavailable.
3101	Land within the Green Belt. Unavailable.
3121	Land within the Green Belt. Unavailable.
3373	Land within the Green Belt. Unavailable.
3605	Land within the Green Belt. Unavailable.
3724	Land within the Green Belt. Unavailable.

Stage 2 – Site Sifting

- A8. Using the land that passed through Stage 1, a second assessment stage used a limited set of strategic criteria (proportionate evidence¹⁸) to further refine the list of sites to a set of *reasonable alternatives* for further assessment using sustainability appraisal. The criteria considered at Stage 2 were related to **Accessibility and Wider Impacts (Stage 2A)** and **Strategic Context (Stage 2B)** and can be summarised as follows:

Accessibility and Wider Impacts (Stage 2A)

- A9. 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. Evidence used to inform this judgement was based on assessment of travel times to key destinations including town centres, employment areas, schools, and healthcare services. This is further detailed in the Site Selection Methodology.
- A10. In addition to accessibility, the following wider impacts were tested through Stage 2:
- **Flood Risk:** Sites were assessed to consider whether a source of flood risk, or combination of flood risks, would likely increase flood risks beyond the site assessed; and the degree to which this would be likely to be possible to mitigate.
 - **Heritage:** A site that was within the setting of a heritage asset, that was likely to lead to substantial harm that could not be mitigated was rejected.
 - **Landscape:** A site that was highly likely to lead to visual harm in the wider landscape, that was unlikely to be possible to be mitigated, was rejected.
 - **Traffic:** A site that was likely to lead to an unacceptable degree of harm in terms of traffic and congestion impacts, and potential for exacerbation of poor air quality, was rejected.

- A11. The outcomes from the Stage 2 assessment were categorised as: high risk of harm (red), medium risk of harm (amber) and low risk of harm (green). Sites with one or more red rating were likely to be rejected at Stage 2.

¹⁸ To meet national requirements, plans must be sound, justified by having an appropriate strategy, considering reasonable alternatives, and based on proportionate evidence.

Strategic Context (Stage 2B)

A12. 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 strategic priorities
- Future growth possibilities for the urban area

A13. In some cases, this part of the assessment influenced the judgement on what pool of possible sites constitute a set of reasonable alternatives for further consideration. This did not pre-judge more detailed testing through sustainability appraisal but enabled sites that were clearly at odds with the strategic context for the settlement, to be ruled out.

Table 8: Strategic context analysis of Bradford on Avon

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. 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.
Significant environmental factors	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. 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. 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>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. • Addressing the climate emergency and enhancing biodiversity, using multifunctioning techniques such as natural flood controls e.g. floodplains.
<p>Future growth possibilities for the urban area</p>	<p>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 2038. Brownfield development is likely to continue to play a key role in meeting the town’s housing needs.</p>

A14. A table comprising the Stage 2A RAG ratings and a concluding commentary formed part of an overall judgement for Stages 2A and 2B combined. The overall judgement on each site could refer to the conclusions reached in the strategic context where this affected a decision to reject or take forward land.

Table 9: Stage 2 site assessment conclusions

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						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.	✓
1039	Land adjacent to Holt Road						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 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	X

Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B – Strategic context and overall judgement	Taken Forward
							further consideration on landscape and heritage grounds.	
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>	

A15. In preparation for Stage 3, the remaining sites were renumbered for ease of understanding, as follows:

Table 10: Sites combined for further assessment

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

A16. At Stage 3, each of the remaining sites in the pool of sites (reasonable alternatives) was examined through sustainability appraisal, 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 sustainability appraisal methodology is provided in a separate report which also includes the detailed assessments made for each site within a series of annexes¹⁹.

A17. The sustainability appraisal process 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 sustainability appraisal criteria used.

A18. Table 11 below shows the conclusions of the sustainability appraisal, for the reasonable alternative sites that were assessed. The overall sustainability appraisal score is shown in column 2 of the table.

A19. The sustainability appraisal weights all ‘objectives’ (shown in the top row, below) equally. There are more environmental objectives than social/economic objectives – scores against environmental objectives typically tend to be negative. The overall score resulting from the potential development of greenfield sites generally yield a negative value.

A20. Reasonable alternatives are rejected at Stage 3 where the sustainability appraisal concludes that development would result in one or more ‘major adverse effect’ (highlighted in red with a triple negative).

¹⁹ Wiltshire Local Plan Review Sustainability Appraisal Report (Wiltshire Council, September 2023)

Planning For Bradford on Avon

A21. Table 12 sets out a descriptive summary of the key outcomes from the sustainability appraisal for each of the sites that were assessed.

A22. At Bradford on Avon, the sustainability appraisal identified that there were likely major adverse effects arising from the development of Site 2 within the pool of sites due to the impact on protected species. Therefore, only one site was taken forward for further consideration to Stage 4 at Bradford on Avon.

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

Key to likely significance of effects:					
+++	Major positive effect = +3 points	0	Neutral effect = 0 points	---	Major adverse effect = -3 points (mitigation unachievable - recommend that is not considered further)
++	Moderate positive effect = +2 points			--	Moderate adverse effect = -2 points (mitigation achievable but problematic)
+	Minor positive effect = +1 point			-	Minor adverse effect = -1 point (mitigation easily achievable)

Table 11: Sustainability appraisal scores for sites assessed at Bradford on Avon

Site	Overall site score (sustainability rank)	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	-	--	+	-	-	+

Table 12: Sustainability appraisal outcomes for sites assessed at Bradford on Avon

Site	SA score and ranking	Likely key issues for site
Site 2	-11 (=1 st)	<p>There is a major adverse effect (where mitigation is considered unachievable) with regards to ecology and bat mitigation, whereby the trees present on the site and its boundary constitute priority habitat requiring retention and wide buffers/ecological protection zones to avoid irreversible losses. There are no other significant adverse effects at this stage.</p> <p>There are moderate adverse effects around water resources and air quality including:</p> <ul style="list-style-type: none"> • The site is within a Drinking Water Protected Area. Drinking water must be protected to ensure it is not polluted. Wiltshire is also a water stressed area, which means developments will need to ensure mitigation measures are in place to reduce water use. • Any further development could impact upon air quality, particularly around the AQMA. However, site 2 is likely to have a lesser impact than site three as traffic heading to Bath can avoid the AQMA. <p>Minor adverse effects likely for climate change, heritage, landscape, poverty and deprivation and land use including:</p> <ul style="list-style-type: none"> • As a former plant nursery there may be some parts of the site that are contaminated. A more detailed assessment of the site would be required prior to any development coming forward. If subsequent evidence suggests the presence of land contamination, a remediation and mitigation strategy would be required. • The site is in flood zone 1 and there is minimal flood risk from other sources. • There are no designated assets affected however the site is adjacent to a conservation area. • The site is part of an undesignated landscape that contains relatively ordinary components. • The site offers good connectivity however is not directing homes to a deprived area and the number of affordable homes provided will be small. • Additional houses in the area could adversely affect existing GP capacity in a location where there are existing issues. • This is a relatively small site and greenfield loss through development would not be significant. • This site requires access through adjacent site being developed to the south of Cemetery Lane. It is understood that written agreement has been secured to allow access through this site.

		<ul style="list-style-type: none"> The site is in fairly close proximity to the town and railway station although improvements to walking and cycling routes will be necessary. <p>Positive effects are likely for housing, energy, and economic growth.</p> <ul style="list-style-type: none"> It is close to the town centre; therefore, connectivity is good.
Site 3	-11 (=1 st)	<p>No major adverse effects (where mitigation is considered unachievable) are likely. This means there are no significant adverse effects that would result in the site being removed at this stage.</p> <p>There are moderate adverse effects around biodiversity, water resources, air quality and landscape including:</p> <ul style="list-style-type: none"> The site is adjacent to the River Avon with large areas of rough grazing and scrub with mature trees in close proximity to sensitive bat areas and county wildlife site. The site is within a Drinking Water Protected Area. Drinking water must be protected to ensure it is not polluted. Wiltshire is also a water stressed area, which means developments will need to ensure mitigation measures are in place to reduce water use. Any further development could impact upon air quality, particularly around the AQMA. Site 2 is likely to have a greater impact than site two as traffic heading to Bath would go through the AQMA. The site has value as local green space and is considered to be generally medium to high landscape sensitivity to housing development. The Cotswolds AONB is located approximately 0.7km to the west of the site with the Great Bradford Wood ancient woodland approximately 0.4km to the east and the Grade II listed The Hall, Bradford-on-Avon Registered Park and Garden is located approximately 240m northwest. <p>Minor adverse effects likely for climate change, heritage, poverty and deprivation and land use including:</p> <ul style="list-style-type: none"> Most of site is in flood zone 1, there will need to be some flood risk mitigation on site. The River Avon runs along the north of the site, presenting some risk. Wide buffer zones will be required which could impact upon the developable area of the site. There is a low flood groundwater flood risk across part of the site, this, alongside potential contaminated land issues could impact upon sustainable drainage techniques. There are no designated assets affected. The site offers good connectivity and could direct homes to a deprived area. Additional houses in the area could adversely affect existing GP capacity in a location where there are existing issues.

		<ul style="list-style-type: none"> • The site was in use as a golf course so development of the site would not be taking land out of agricultural production. • The site is served by typical post war estate road with good pedestrian access, but local parking may present capacity constraints that may need to be addressed. There are opportunities to maximise walking and cycling access to the town centre. <p>Positive effects are likely for housing, energy, and economic growth.</p> <ul style="list-style-type: none"> • It is close to the town centre; therefore, connectivity is good.
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Stage 4 – Selection of Sites

A23. Stage 4 enabled the outcomes of the sustainability appraisal 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 that are listed in Section 2 of this report. 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 order to meet the identified housing and employments needs for the settlement.

A24. The sustainability appraisal identifies that Site 2 was likely to result in major adverse effects in respect of ecological impacts with regards to ecology and bat mitigation, whereby the trees present on the site and its boundary constitute priority habitat requiring retention and wide buffers/ecological protection zones to avoid irreversible losses.

A25. Therefore, this site was removed from further consideration with only one site being taken forward for assessment at Stage 4.

A26. The outcome of Stage 4 refined the results of the Stage 3 sustainability appraisal and identified preferred sites that are more sustainable and support the Local Plan objectives.

A27. The remaining site was evaluated against the Place Shaping Priorities, looking at strengths, weaknesses, opportunities and threats (SWOT). This process enabled decisions to be made between site options where Stage 3 outcomes were finely balanced, in settlements where more than one site was being considered – albeit only one site remained in the process at Bradford on Avon.

A28. The SWOT assessment concluded the following outcomes for each site and Place Shaping Priority:

	Strength and/or opportunity
	No significant SWOTs
	Weakness and/or threat

A29. 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. For Bradford-on-Avon, this part of the process was not undertaken as only a reserve site is being identified.

A30. The site option at Bradford on Avon was assessed against the Place Shaping Priorities, which is set out in the following table:

Table 13: Assessment of sites against the Place Shaping Priorities

Site	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	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 approx. 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 be 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.

A31. 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 while no allocations are proposed at Bradford on Avon in the Plan, the following site has emerged as a reserve site at Bradford on Avon:

- Land at Former Golf Club

A32. The map below illustrates the outcome of the site selection process (Stages 1-4) at Bradford on Avon.

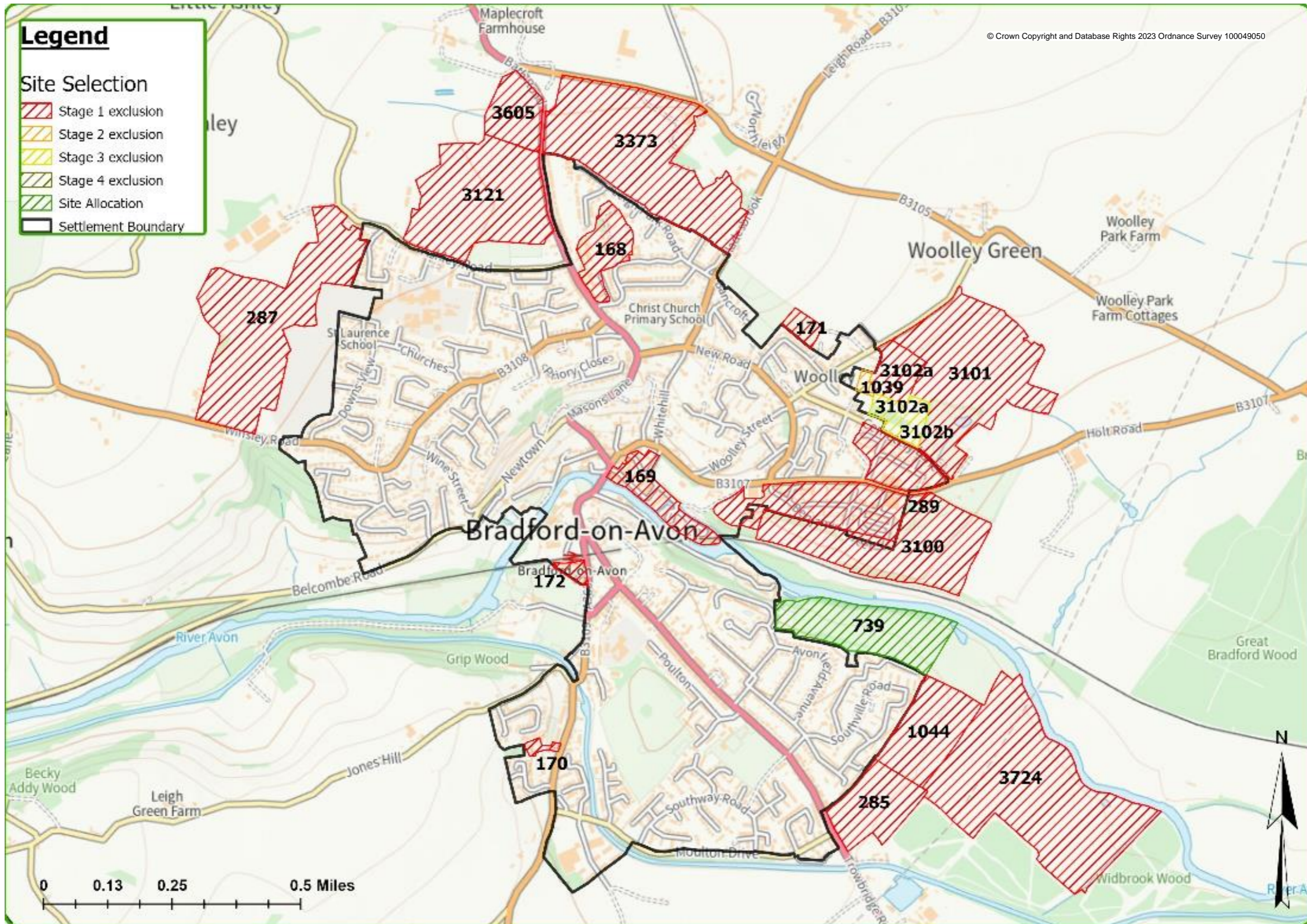


Figure 8. The results of the site selection process at Bradford-on-Avon