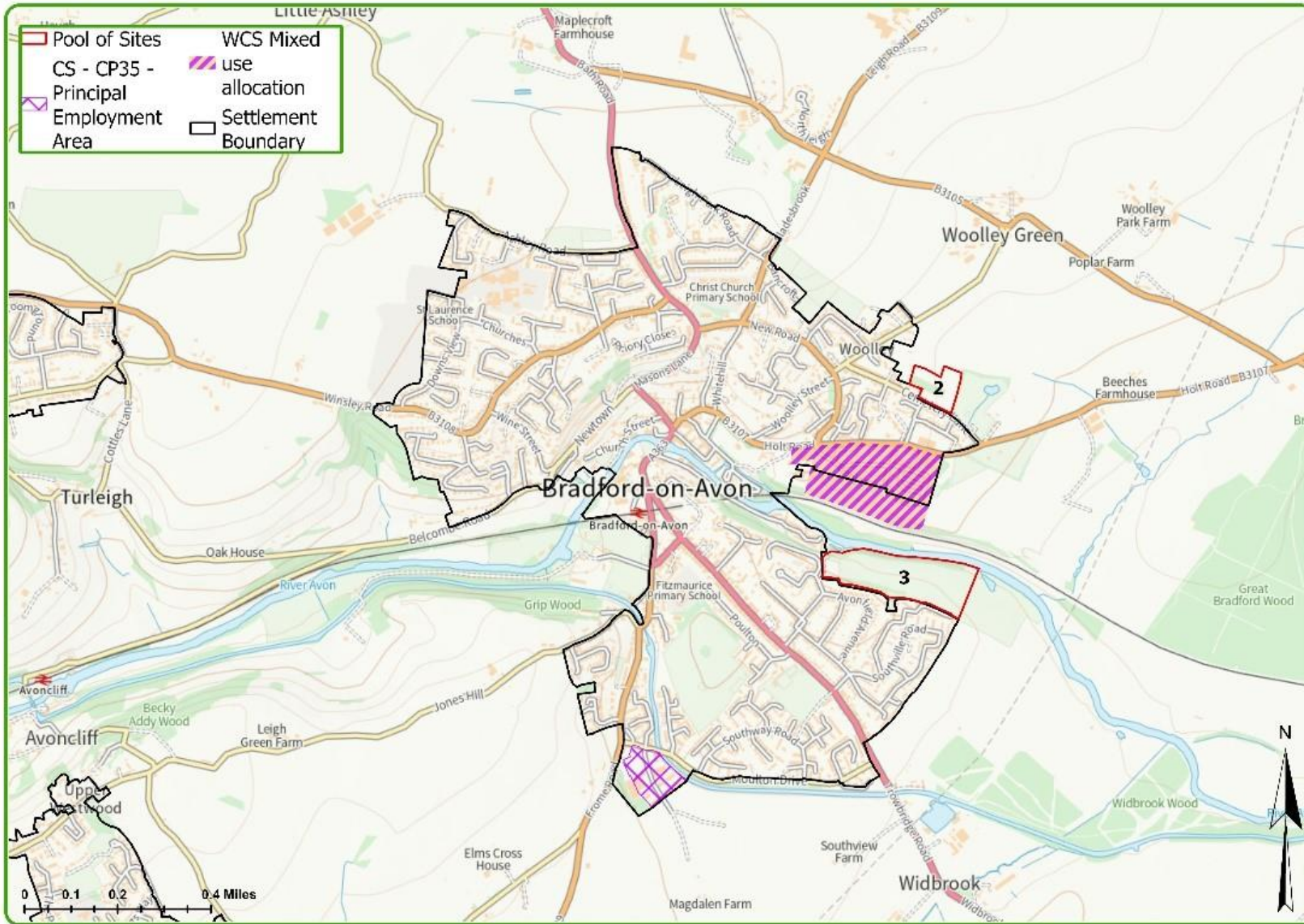


SA Annex 2.2 - Trowbridge HMA: Bradford on Avon Sites Assessment



<p>Site Number and SHELAA ref(s): Site 2 (SHELAA site 3102a) Site name: Land North of Holt Road and North of Cemetery Lane Site size: 1.81 ha Site capacity: approximate range 45 - 63 dwellings Site description: The site is located north of Cemetery Lane, on the eastern edge of Bradford on Avon. A large area of the site has established tree cover which disguises dilapidated former commercial greenhouses. The site is open to the north with views across the Avon Valley and clay vales. It is surrounded by Local Green Space to the north, the Wooley Conservation Area to the north-west and the West Wiltshire Green Belt to the east. Recent residential and employment development has taken place to the south of the site at Land between North of Holt Road and South of Cemetery Lane and Land South-West of Kingston Farm Buildings, Holt Road.</p>	
<p>SA objective 1 - Protect and enhance all biodiversity and geological features and avoid irreversible losses Decision-Aiding Questions. Will the development site...</p>	
<p>1. Avoid potential adverse impacts of development on local biodiversity and geodiversity?</p>	<p>Comprising part of an irregular shaped pastoral field, a large part of the site constitutes the site of a former glasshouses/plant nursery that is now broadleaf woodland. The southern site boundary is bound by roadside hedgerows and overhanging trees, these features also present around the eastern boundary of the field. Hedgerows and tree boundaries also form much of the west boundary, to private gardens. A broadleaved tree exists in the northeast section of the site and the land around is agricultural. The southern, eastern, and northern section of the site appears to comprise grazed pasture / hay field that forms part of a larger field. Protection, maintenance, and enhancement should be provided for habitats such as hedgerows, trees and water features within and along the boundaries of the site alongside other ecologically valuable habitat/features. A minimum of 10% net gain for biodiversity is required within individual sites (as per latest biodiversity metric) and the overall layout and design of this site should ensure that habitat creation provides connectivity to adjacent or nearby habitat areas. Development of this site would appear likely to result in a considerable net loss in biodiversity and biodiversity net gain on site would not be possible.</p>
<p>2. Protect and enhance designated and non-designated sites, priority species and habitats and protected species?</p>	<p>Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) / Winsley Mines Site of Special Scientific Interest (SSSI) lies approximately 3.9km west by southwest of the site. As such, the western half of the site is in the greater horseshoe bat 4km core area / consultation zone. Similarly, the whole of the site also lies in the 4km core area for greater horseshoe bats around the core hibernation roost at Gripwood Quarry Site of Special Scientific Interest (SSSI) and within the 2km core area for lesser horseshoe bats around the core maternity roost at Belcombe Court and the Carpenters Shop at Kingston Mills. The above core roosts are functionally linked to the SAC and have demographic connections with SAC greater horseshoe and lesser horseshoes bat populations. The site itself contains semi-natural habitat that is highly likely to comprise commuting and foraging habitat for a range of bat species, including Annex II species and may also be used by roosting bats. Loss of and/or impacts to bat habitat at the site has potential to lead to significant effects on the SAC and its qualifying species. In terms of priority habitat, 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. Priority habitat should be retained with wide buffer/ecological protection zones and buffers should remain unilluminated / not subject to additional light spill and retained as "dark corridors". Given the required avoidance, reduction and mitigation measures can only be achieved through much reduced development capacity it would likely render allocation and development of the site unfeasible. There are numerous recent records of bats in the vicinity of the site and a greater horseshoe bat roost has been recorded at Bradford-on-Avon Cemetery Lodge located approximately 157m southeast of site and it is highly likely that the tree line serves as a key flight line, and that greater horseshoe bats commute and forage at the site. Broadleaved trees on site may also afford potential roost features for bats. The site appears to provide optimal terrestrial habitat for great crested newts and has habitat connectivity with the terrestrial habitat adjacent to the two local ponds. Habitat may afford breeding opportunities for a range of bird species and such habitat will likely also afford winter foraging opportunities for a range of species. There are a number of records of badger in the vicinity.</p>
<p>3. Ensure that all new developments protect Local Geological Sites (LGSs) from development?</p>	<p>The development of the site would be unlikely to lead to impacts on designated Local Geological Sites (LGS). There are no LGS within or in close proximity to this site.</p>

4. Aid in the delivery of a network of multifunctional Green Infrastructure?	<p>Green and blue infrastructure (GBI) incorporates a wide range of natural green and blue assets ranging from water courses, rights of way and farmland to woodland, hedgerows, street trees. Embedding GBI into well-designed built development (buildings, streets, neighbourhoods, and strategic connectivity) can help enhance the built and natural environment, facilitate biodiversity net gain, and help communities and wildlife become more resilient to climate change. On site features that could aid the delivery of a strategic network of GBI include, for example:</p> <ul style="list-style-type: none"> Retention of on-site/boundary woodland, trees/hedgerows and associated provision of wide buffer/ecological protection zones <p>In line with national policy, local plan policy and standard advice from relevant bodies, the development of the site should conserve and enhance green infrastructure and holds the potential to make suitable provision for buffers at recognised water course/green corridors.</p>
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Assessment outcome (on balance): Major (significant) adverse effect

Summary of SA Objective 1

- The site comprises part of an irregular shaped pastoral field and a large former glasshouses/plant nursery that is now broadleaf woodland. The southern and eastern site boundary is bound by roadside hedgerows and overhanging trees. Hedgerows and tree boundaries also form much of the west boundary, to private gardens.
- Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) / Winsley Mines Site of Special Scientific Interest (SSSI) lies approximately 3.9km west by southwest of the site. As such, the western half of the site in the greater horseshoe bat 4km core area / consultation zone. Similarly, the whole of the site also lies in the 4km core area for greater horseshoe bats around the core hibernation roost at Gripwood Quarry SSSI and within the 2km core area for lesser horseshoe bats around the core maternity roost at Belcombe Court and the Carpenters Shop at Kingston Mills.
- The site itself contains semi-natural habitat that is highly likely to comprise commuting and foraging habitat for a range of bat species, including Annex II species and 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 priority habitat should be retained with wide buffer/ecological protection zones and buffers should remain unilluminated / not subject to additional light spill and retained as "dark corridors".
- Given the required avoidance, reduction and mitigation measures can only be achieved through much reduced development capacity it would likely render allocation and development of the site unfeasible.
- There are numerous recent records of bats in the vicinity of the site while broadleaved trees on site may also afford potential roost features for bats. The site appears to provide optimal terrestrial habitat for great crested newts and has habitat connectivity with the terrestrial habitat adjacent to the two local ponds.
- Protection, maintenance, and enhancement should be provided for habitats such as hedgerows, trees and water features within and along the boundaries of the site alongside other ecologically valuable habitat/features.
- Scope for integrated green and blue infrastructure (GBI) include opportunities presented by the retention of on-site/boundary woodland, trees/hedgerows, and associated provision of wide buffer/ecological protection zones.
- A minimum of 10% net gain for biodiversity is required within individual sites (as per latest biodiversity metric) and the overall layout and design of this site should ensure that habitat creation provides connectivity to adjacent or nearby habitat areas. Development of this site would appear likely to result in a considerable net loss in biodiversity and biodiversity net gain on site would not be possible.
- Overall, a major adverse effect is considered likely against this objective.

SA objective 2 - Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
Decision-Aiding Questions. Will the development site...

1. Ensure development maximises the efficient use of land?	It is considered that development of this site could maximise the efficient use of land. There is new residential development near to this site off Cemetery Lane and the B3107 which would give some indication of the density that could be achieved.
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2. Maximise the reuse of Previously Developed Land?	This is a relatively small site and greenfield loss through development will not be significant. The site contains the remains of former plant nursery buildings and greenhouses which have now largely been taken over by vegetation and scrub. This has largely blended into the landscape and would probably not be regarded as PDL.
3. Encourage remediation of contaminated land? If so, would this lead to issues of viability and deliverability?	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.
4. Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)?	Evidence on Agricultural Land Classification (DEFRA spatial data download) shows this site as consisting wholly of urban land and therefore not agricultural land. Therefore, any development of this site would not lead to the loss of BMV agricultural land.
5. Lead to the sterilisation of viable mineral resources? If so, is there potential to extract the mineral resource as part of the development?	This site is within the Minerals Safeguarding Area but is next to existing residential areas therefore there may be some buffering potentially for underground workings. Development of this site is not considered likely to lead to the significant sterilisation of mineral resources.
6. Support the provision of sustainable waste management facilities and include measures to help reduce the amount of waste generated by development through integrated recycling infrastructure?	There are no known reasons why sustainable waste management facilities and integrated recycling infrastructure could not be incorporated successfully into the layout and design of any development on this site. The nearest Household Recycling Centre is located in Trowbridge approximately 2.5km away. The site is not located within, or likely to affect a designated safeguarding zone associated with an active waste management facility, or allocated Waste Site Allocation.
Assessment outcome (on balance): Minor adverse effect	
Summary of SA Objective 2 <ul style="list-style-type: none"> • It is considered that development of this site could maximise the efficient use of land and there are new residential areas adjacent to the site • This is a relatively small site and greenfield loss through development will not be significant • Any development of this site would not lead to the loss of BMV agricultural land • Development of this site is not considered likely to lead to the significant sterilisation of mineral resources • Overall, given the relatively small size of this site and the lack of likely significant effects against this objective, a minor adverse effect is considered likely. 	
SA objective 3 - Use and manage water resources in a sustainable manner	

Decision-Aiding Questions. Will the development site...	
1. Protect surface, ground and drinking water quantity/ quality?	This site is not covered by any Source Protection Zones or Drinking Water Safeguard Zones. The site is covered by a Drinking Water Protected Area. Drinking Water Protected Areas (Surface Water) are, within the Water Framework Directive, where raw water is abstracted from rivers and reservoirs. Raw water needs to be protected to ensure that it is not polluted which could lead to additional purification treatment. To do this water companies and the Environment Agency identify raw water sources that are 'at risk' of deterioration which would result in the need for additional treatment. These zones are areas where the land use is causing pollution of the raw water. Action is targeted in these zones to address pollution so that extra treatment of raw water can be avoided. Therefore, consultation with the Environment Agency would be required to understand determine the likely effects of the development. In line with the provisions of local planning policy and the Water Framework Directive, the development of this site will need to make suitable provision to protect and, where appropriate, improve local surface, ground, and potable drinking water quality – this includes ensuring that enough buffer zones are located adjacent to any watercourses and ensuring that runoff does not enter these watercourses. Consideration should be given to the inclusion of Sustainable Drainage Systems to control the risk of surface water flooding from impermeable surfaces.
2. Direct development to sites where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?	This site falls within the catchment area supplied by Wessex Water. With regard to water supply, Wessex Water have noted that a moderate amount of development on sites at Bradford-on-Avon would lead to the least number of possible reinforcements on service infrastructure. It is likely that moderate off-site infrastructure reinforcement would be required. The area covered by Wessex Water has been classed by the Environment Agency as 'seriously water stressed'. Steps will need to be taken to ensure the efficient use of water through the development and occupation of the site. With regard to foul 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. It is likely that moderate off-site infrastructure reinforcement would be required. Surface water must be discharged in accordance with local and national policy, and there must be no surface water connections to the foul sewer network.
Assessment outcome (on balance): Moderate (significant) adverse effect	
Summary of SA Objective 3	
<ul style="list-style-type: none"> • The site is not covered by any Source Protection Zones or Drinking Water Safeguard Zones • The site is covered by a Drinking Water Protected Area. • The area covered by Wessex Water has been classed by the Environment Agency as 'seriously water stressed'. Steps will need to be taken to ensure the efficient use of water through the development and occupation of the site. • With regard to water supply, Wessex Water have noted that a moderate amount of development on sites at Bradford-on-Avon would lead to the least number of possible reinforcements on service infrastructure. It is likely that moderate off-site infrastructure reinforcement would be required. • With regard to foul 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. • On the basis of the above evidence, a moderate adverse effect is likely. 	
SA objective 4 - Improve air quality and reduce all sources of environmental pollution	
Decision-Aiding Questions. Will the development site...	
1. Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration?	Development of this site is likely to lead to increased levels of environmental pollution, including noise, light and vibration – both during construction and operational phases. Road traffic noise will need to be assessed and mitigated against. Mitigation measures could feasibly be achieved onsite.
2. Reduce impacts on and work towards improving and locating sensitive development	Bradford On Avon has an Air Quality Management Area (AQMA) in respect of the nitrogen dioxide annual mean objective. Exceedances exist on Masons Lane and Market Street and there are a number of hotspots in the town centre. Traffic from new development in this location would feed into the network of roads that uses Masons Lane and Market Street, further contributing to elevated oxides of nitrogen. If allocations at Bradford on Avon are made through the LPR then CIL/S106 contributions will be

away from areas likely to experience poorer air quality due to high levels of traffic and poor air dispersal?	required to enable actions for the revocation of the Air Quality orders. Air Quality assessment would be required showing cumulative effects of development on relevant receptors in the AQMA in Bradford on Avon.
3. Lie within a consultation risk zone for a major hazard site or hazardous installation?	This site does not lie within a consultation risk zone for a major hazard site or hazardous installation.
Assessment outcome (on balance): Moderate (significant) adverse effect	
Summary of SA Objective 4	
<ul style="list-style-type: none"> • Development of this site is likely to lead to increased levels of environmental pollution, including noise, light and vibration – both during construction and operational phases. • Bradford On Avon has an AQMA, and traffic from new development in this location could lead to further elevated levels of oxides of nitrogen, which would require mitigation. • Based on the above evidence, a moderate adverse effect is likely. 	
SA objective 5 - Minimise our impacts on climate change (mitigation) and reduce our vulnerability to future climate change effects (adaptation)	
Decision-Aiding Questions. Will the development site...	
1. Maximise the creation and utilisation of renewable energy opportunities, including low carbon community infrastructure such as district heating?	As this is a smaller site, it is considered that minor emissions would be produced during the construction and occupation of the site. Mitigation measures can still be applied within this objective and across the whole framework to reduce emissions. Some examples include building energy efficient buildings, generating on site renewable energy and delivering sustainable transport. It would be possible for a development of this scale to include minor renewable energy generation; however, this would mainly be within buildings rather than areas of open space. There is no existing district heating network for this site to link into. To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources from developers, that maximises the potential for suitable development, considers identifying suitable areas for renewable and low carbon energy sources and identifies opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.
2. Be located within Flood Zones 2 or 3? If so, are there alternative sites in the area within Flood Zone 1 that can be allocated in preference to developing land in Flood Zones 2 or 3?	The whole site is in Flood Zone 1. This means that each year, this land has less than 0.1% chance of flooding from rivers or the sea. There are no main rivers within 100m of the site.
3. Minimise vulnerability to surface water flooding and other sources of flooding, without	There is very low risk of surface water and groundwater flooding to the site. Cumulative impacts have been scored low. More stringent policy with regards the control of surface water discharges from new development is required. The site will require a Flood Risk Assessment to ensure there is no flood risk to site and that development of this site won't exacerbate Flood Risk elsewhere.

increasing flood risk elsewhere?	<p>4. Promote and deliver resilient development that is capable of adapting to the predicted effects of climate change, including increasing temperatures and rainfall, through design e.g. rainwater harvesting, Sustainable Drainage Systems, permeable paving etc?</p> <p>Plans for developing this site should take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for flood risk, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. It is considered that any future development of this site could incorporate appropriate measures to adapt to the predicted future impacts of climate change. The location, layout and design of any new development should be planned to avoid increased vulnerability to the range of impacts predicted to arise from climate change, including flood risk, water supply and changes to biodiversity and landscape. This site is located less than 1 km from the town centre, enabling active travel to the town centre and ease of access to public transport.</p> <p>It is anticipated that Wiltshire will experience hotter summers, milder winters, increased periods without rain, increased intensity in rainfall and more extreme weather events. Development would need to include adaptation measures such as designing to prevent overheating, heat resistant landscaping, more resilient foundations, drought resistant planting and for generally more resilient buildings and spaces (general design and robust materials).</p> <p>As this is a small site, there may not be much provision for large areas of green infrastructure, however there will be less greenfield land lost. Enough land would need to be set aside for robust surface water management, to include comprehensive surface water drainage measures (including SuDS) that result in run-off rates equalling or bettering current greenfield infiltration rates.</p>
Assessment outcome (on balance): Minor adverse effect	
<p>Summary of SA Objective 5</p> <ul style="list-style-type: none"> • All of the site is in Flood Zone 1. • Flood risk could be exacerbated by climate change. Although development could avoid this area and avoid risk, it may worsen the risk elsewhere. • Cumulative impacts have been scored low. • It would be possible for this development to include renewable energy generation, however there may be limited opportunity to use open space as this is a smaller site. It is considered that any future development could incorporate appropriate measures to adapt to the predicted future impacts of climate change. • Although the size of this site may not lend itself to large amounts of renewable energy opportunity, it also has the potential to produce significantly less greenhouse gas emissions than a larger site. These emissions could be reduced through the design and layout of the site, by ensuring high levels of energy efficiency in all new buildings to reduce energy use, through mixed-use development that can reduce the need to travel and by ensuring as much choice and access as possible to efficient and reliable sustainable modes of transport. • Overall, this is a smaller site which should produce minor emissions. It is considered that there are opportunities to support resilient development, which supplies energy efficient buildings and provides investment in renewable energy. New development would be in Flood Zone 1. However, given the loss of greenfield land which thus natural drainage, a minor adverse effect is likely. 	
<p>SA objective 6 - Increase the proportion of energy generated by renewable and low carbon sources of energy Decision-Aiding Questions. Will the development site...</p>	
1. Support the development of renewable and low carbon sources of energy?	<p>As this is a small site, there may be less open space available for opportunities to support energy generation from renewable and low carbon sources. There may still be opportunities for renewable energy generation on a smaller scale, for example, solar panels on roofs. To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources from developers, that:</p> <ul style="list-style-type: none"> • maximises the potential for suitable development. • considers identifying suitable areas and options for renewable and low carbon energy sources; and • identifies opportunities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply systems and for co-locating potential heat customers and suppliers.
2. Be capable of connecting to the local Grid without the need for further investment?	<p>The electricity infrastructure is constrained across much of Wiltshire. The Grid Supply Points in Wiltshire, located in Minety and Melksham are both constrained. The Bulk Supply Points across Wiltshire are also constrained. Due to the uptake of low carbon technology, and the move towards net zero, the Climate Change Committee have estimated that energy demand could almost treble by 2050. This increased pressure on the system is something SSEN, as Distribution Systems Operator, is working on to manage new system capacity. Solutions may include flexible connections, renewable energy, and further investment to reinforce the current infrastructure.</p>

	<p>Early engagement with SSEN may be required to discuss connections issues and new solutions may be required.</p> <p>As this is a smaller site, there would be less demand on the current infrastructure. According to SSEN's generation availability map, the substation in Braford on Avon is constrained, therefore could potentially struggle to withstand additional energy generation connections to the grid, if the site were to produce its own energy. According to SSEN's Network Capacity (demand) Map, the substation in Bradford-on-Avon is constrained, therefore could potentially struggle to withstand further significant demand. Further conversation with SSEN would be required to ensure connectivity to the grid.</p> <p>It is not known how the site will be brought forward - if the site was able to support its own renewable energy, then the site would be less likely to depend on the grid, however it is considered that this site may struggle to allocate much open space for renewables.</p>
3. Create economic and employment opportunities in sustainable green technologies?	It is considered that a site of this size would enable less economic and employment opportunities in sustainable green technologies. There may be parts of the site that could be suitable for renewable and low carbon energy sources and supporting infrastructure however it is considered that most of the site will be used for development to improve viability. With less renewable energy generation on site there are fewer possibilities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply systems onsite and for co-locating potential heat customers and suppliers. However, as this is a smaller site, there will be a lower energy demand.
4. Deliver high-quality development that maximises the use of sustainable construction materials?	It is considered that development of this site would be able to deliver a high-quality development that makes maximum use of sustainable construction materials throughout the development.
5. Deliver energy efficient development that exceeds the minimum requirements set by Building Regulations?	It is considered that development of this site would be able to deliver an energy efficient development that exceeds minimum requirements set by Building Regs. However, this will need to be factored into the increased demand the site will have on the existing infrastructure.
Assessment outcome (on balance): Neutral effect	
<p>Summary of SA Objective 6</p> <ul style="list-style-type: none"> • It is considered that a site of this size would not support large-scale renewable energy generation or create economic and employment opportunities in sustainable green technologies as there is limited space available. It would still be possible to generate renewable energy on a smaller scale. • There will need to be a positive strategy for energy from renewable sources from developers for example, solar panels. • New developments should consider incorporating electric vehicle charging points, which will encourage the use of more sustainable modes of transport but will increase the energy demand of the site. • As this is a smaller site, energy demand will be less than a larger site. • It is considered that the current energy infrastructure is constrained and could struggle to cope with the increased demand of this site. Early conversations with SSEN will be required for this site. • Overall, given that this is a smaller site, energy demand will be less than that of a larger site. There may be opportunities for small scale renewable energy generation, and there is potential for this site to provide electric vehicle charging points, which would encourage more sustainable car use, therefore a neutral effect is considered likely against this objective. 	
<p>SA objective 7 - Protect, maintain and enhance the historic environment</p> <p>Decision-Aiding Questions. Will the development site...</p>	

<p>1. Conserve and enhance World Heritage Sites, Scheduled Monuments, Listed Buildings, the character and appearance of Conservation Areas, Historic Parks & Gardens, sites of archaeological interest and, where appropriate, undesignated heritage assets and their settings?</p>	<p>There are no listed buildings in proximity to this site.</p> <p>The north, east and south borders of the site comprises of not highly sensitive historic landscape incorporating 21st century amalgamated field character, with former piecemeal field character remaining legible with the remainder of the site is characterised as 20st century to 21st century terraced housing at Woolley. Mitigation could include incorporation of surviving historic landscape elements, such as field patterns, hedgerows and mature trees, within future development.</p> <p>There are low value archaeological features close to the site which include extensive medieval/post medieval ridge and furrow field system visible as earthworks which are bordering the site to the northeast and extending further outward. Further ridge and furrow field system in the southern buffer area. The former Woolley Green Park boundary extends into the north-eastern buffer area with undated ditches in the southern and eastern buffer areas.</p> <p>Undated ditches in the south and east buffer areas indicate potential archaeological remains extending into the site. Further investigation may be needed during a planning application process to identify the presence and significance of as yet unknown archaeological remains however this may be hindered by the previous use of the site as a nursery where ground disturbance will have taken place. However, based on evidence that is currently available and known, the site appears to be not heavily constrained by archaeological remains. Following further investigation, mitigation strategy could include preservation by record where relevant.</p>
<p>2. Maintain and enhance the character and distinctiveness of settlements through high quality and appropriate design, taking into account, where necessary, the management objectives of Conservation Areas?</p>	<p>In accordance with national policy/local policy, the development of the site for housing could deliver housing that maintains and enhances the distinctiveness of settlements through high quality design. No details of any potential future development scheme or design and layout are currently known. Development of the site would have the potential to appropriately protect and enhance designated heritage assets according to their significance.</p> <p>The site adjoins conservation area (CA) and would lead to an impact on designated conservation area. Conservation area Character Assessment notes views across the open agricultural area to the east contribute to the rural character of the Woolley area. The need to respect the setting of the CA (development likely to be restricted to previously built area) is likely to reduce capacity of site.</p>
<p>Assessment outcome (on balance): Minor adverse effect</p>	
<p>Summary of SA Objective 7</p> <ul style="list-style-type: none"> • The potential for significant adverse heritage/conservation effects is low. • The potential for significant adverse archaeological effects is low. • The potential for significant adverse historic landscape effects is very low. • The site is adjacent to a conservation area. • Overall, a minor adverse effect is likely. 	
<p>SA objective 8 - Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place. Decision-Aiding Questions. Will the development site...</p>	
<p>1. Minimise impact on and, where appropriate, conserve and enhance</p>	<p>The Cotswolds AONB sits approximately 1.2km to the southwest of the site while Great Bradford Wood ancient woodland lies approximately 950m southeast. The Hall, Bradford-on-Avon Registered Park and Garden (Grade II) is located approximately 500m southwest. While development should be sensitive to these landscapes, significant impacts on nationally designated landscapes from development are not anticipated.</p>

<p>nationally designated landscapes e.g. National Parks and AONBs and their settings?</p>	
<p>2. Minimise impact on, and enhance, locally valued landscapes through high quality, inclusive design of buildings and the public realm?</p>	<p>The site lies on the northeast edge of Bradford-on-Avon, to the north of Woolley Terrace/Cemetery Lane. Land to the south and east of the site is consented for residential development.</p> <p>The site is on the gently sloping mid-slopes that rise from the River Avon in the east, through the north of Bradford-on-Avon. Comprising part of an irregular shaped pastoral field, forming part of the mixed agricultural landscape extending north of Bradford on Avon, within the site is the site of a former glasshouses/plant nursery. Strips of hardstanding remain, encompassed by a substantial group of mature trees and shrubs in the centre of the site. The southern site boundary is bound by roadside hedgerows and overhanging trees, these features also present around the eastern boundary of the field. Hedgerows and tree boundaries also form much of the west boundary, to private gardens.</p> <p>The local landscape is characterised by medium to large, irregular fields bound by largely intact hedgerows with occasional trees, and stone walls particularly along the local roads. The site itself has a predominantly rural character, although this would be altered by the adjoining consented development that would form new settlement boundaries to the south and east of the site. Existing properties adjoining the site comprise a mix of housing types of various sizes, largely separated from the site by sizable private gardens. The existing settlement edge is generally well integrated by hedgerow boundaries and occasional trees.</p> <p>The site forms part of an undesignated landscape that contains relatively ordinary components. It is on the edge of the settlement and contributes to the rural landscape that separates Bradford-on-Avon from the outlying rural settlement of Woolley Green to the north. The site contains a substantial group of mature trees that separate the site from the existing settlement edge. It is part of a generally simple, rural landscape that is in generally moderate condition and has some local scenic qualities. The site has limited sense of place, although contributes to the well-integrated settlement edge.</p> <p>Overall, the site is of generally medium to low landscape sensitivity to development. The site has generally medium to high capacity to accommodate housing development.</p> <p>Potential for significant adverse effects include the following:</p> <ul style="list-style-type: none"> • Potential for built form a conspicuous settlement edge to the north of the site. • Potential for development to contribute to coalescence of Bradford-on-Avon with the outlying rural village of Woolley Green. • Potential loss of vegetation features including hedgerows and groups mature trees that contribute to the generally well-integrated settlement edge. <p>Scope for mitigation include the following:</p> <ul style="list-style-type: none"> • Limit development in the north of the site and create an appropriate landscape buffer to retain the character of the rural settlement edge. • Avoid development that does not respect the scale, setting and form of the existing settlement. • Retain and enhance hedgerows and trees as part of a mature landscape framework that contributes to a soft, well-integrated settlement;
<p>3. Protect and enhance rights of way, public open space and common land?</p>	<p>There are no public footpaths through the site. The north of the field, which the site forms a part of, is allocated as a Local Green Space (LGS). A public footpath passes through the north of the LGS and links around the northeast of Bradford-on-Avon between the local roads and villages. The path forms part of network of waymarked walking routes between outlying villages, which are locally promoted as the Bradford-on-Avon Wheel offering opportunity to link in with the site.</p>
<p>Assessment outcome (on balance): Minor adverse effect</p>	
<p>Summary of SA Objective 8</p> <ul style="list-style-type: none"> • Likely effects on nationally designated landscapes are not considered to be significant. • The site, an irregular shaped pastoral field, is on the gently sloping mid-slopes that rise from the River Avon in the east forming part of the mixed agricultural rural landscape extending north of Bradford on Avon. Within the site is the site of a former glasshouses/plant nursery. Hedgerow and trees bound most of the site. • Existing properties adjoining the site comprise a mix of housing types of various sizes, largely separated from the site by sizable private gardens. The existing settlement edge is generally well integrated by hedgerow boundaries and occasional trees. 	

<ul style="list-style-type: none"> • The site forms part of an undesignated landscape that contains relatively ordinary components. It is part of a generally simple, rural landscape that is in generally moderate condition and has some local scenic qualities. The site has limited sense of place, although contributes to the well-integrated settlement edge. • While no public footpaths run through the site, the north of the field is allocated as a Local Green Space (LGS) with a public footpath passes through the north of the LGS. • The site is of generally medium to low landscape sensitivity to development. The site has generally medium to high capacity to accommodate development. • Overall, development of this site is considered likely to have a minor adverse effect on this SA objective. 	
SA objective 9 - Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures Decision-Aiding Questions. Will the development site...	
1. Provide an appropriate supply of affordable housing?	The record of housing delivery at Bradford on Avon to date has been in line with planned levels over the WCS plan period. Notwithstanding any mitigation that may be required which results in a reduced developable area, the development range for this site means that it has potential to deliver a small number of affordable homes. This could contribute, either alone or in combination with other sites, to the delivery of affordable housing at Bradford on Avon.
2. Support the provision of a range of house types and sizes to meet the needs of all sectors of the community?	Should this smaller site be developed for residential uses, and notwithstanding any mitigation that may be required which results in a reduced developable area, it has the potential to provide for a range of housing needs and types. The site has the potential to deliver a range of high-quality, sustainable homes of different types and tenures, which would be beneficial to addressing identified local housing needs.
Assessment outcome (on balance): Minor positive effect	
Summary of SA Objective 9 <ul style="list-style-type: none"> • Notwithstanding any mitigation that may be required which results in a reduced developable area, this smaller site could bring forward a small amount of affordable housing as part of a housing development. • The site would be likely to support a range of house types, tenures and sizes to meet different needs. • Overall, a minor positive effect is considered likely against this objective. 	
SA objective 10 - Reduce poverty and deprivation and promote more inclusive communities with better services and facilities Decision-Aiding Questions. Will the development site...	
1. Maximise opportunities for affordable homes and job creation within the most deprived areas?	The Indices of Multiple Deprivation (IMD) 2019 identify this site as being situated in an area with little deprivation. Development would not lead to new homes and jobs towards more deprived area so would be unlikely to result in social benefits through new jobs and homes. The site has the potential to deliver up to a total of up to 63 homes of different types and tenures. This site could deliver a minor amount affordable housing. Overall, there could be some social and economic benefits for the Bradford on Avon area through housing provision, short-term construction jobs and a larger workforce for local businesses.
2. Be accessible to educational, health, amenity greenspace, community and town centre facilities which are able to cope with the additional demand?	Bradford on Avon town centre is situated approximately 1km to the west of this site. This is a smaller site which lacks existing sustainable transport connectivity and opportunities to enhance connectivity may be limited due to the size of the site. Existing onsite woodland could be incorporated into a scheme on this site to achieve amenity greenspace onsite, despite its size. Offsite recreational greenspace is apparent less than 1km away at Sladesbrook Park and the River Avon, to the west and south, respectively. Housing development at this site could generate the need for 7-10 early years places, 17-23 primary school places and 12-17 additional secondary places. Financial contributions would be required in to create additional early years and secondary places in existing provision, including towards the expansion of St Laurence School. Primary education needs arising from this site could be met by an existing surplus of places in existing facilities. There is only one GP surgery at Bradford on Avon. The site is less than 1km from GP provision in Bradford on Avon. There are major issues with the GP practice and new development should look to support new build health provision. The small nature of the site suggests it would be unlikely to make a significant contribution to overcoming issues related to health care provision in Bradford on Avon. Although contributions may help to balance the impacts of additional patients, equally adverse impacts could

	arise as a result of increased pressure and only a limited contribution towards overcoming these constraints. Financial contributions are to be sought through development to ensure new residents have access to healthcare facilities.
3. Promote/create public spaces and community facilities that support public health, civic, cultural, recreational and community functions?	The small scale of this site suggests that it would be unlikely to deliver onsite public open space, however existing trees present an opportunity for formal/informal recreation greenspace. The site would be unlikely to deliver onsite community facilities as part of a mixed-use development.
4. Reduce the adverse impacts associated with rural isolation, including through access to affordable local services for those living in rural areas without access to a car?	Development of this site would extend Bradford on Avon to the east and development could about the Green Belt Boundary. There may be some benefits to residents of Woolley Green and surrounding rural residents if the development of this site was able to support sustainable transport improvements, e.g. paths and buses, in this area, while avoiding coalescence with hamlets and villages in the open countryside. The size of this site would restrict the contribution to reducing rural isolation, but improvements could be apparent.
Assessment outcome (on balance): Minor adverse effect	
Summary of SA Objective 10	
<ul style="list-style-type: none"> • Development at this site would not be directing new homes to a more deprived area. • Site is likely to provide a minor number of affordable homes as part of a housing development. • The site has connectivity to the town centre, although there are poor sustainable transport links in the area and accessibility could be improved. • Amenity greenspace could be incorporated into a scheme. • Early years, primary and secondary schooling provision could be met through existing provision and through the creating of additional provision at existing facilities. • Accessibility to existing health care provision is good, however additional houses in the area could adversely affect existing GP capacity in a location where there are existing issues. Financial contributions would be necessary to avoid negative impacts on health services through an increase in patients, but these are unlikely to achieve a new surgery which is needed in overcoming health care constraints in the area. • The site would be unlikely to support the onsite provision of community facilities but could make some contribution to reducing rural isolation. • Overall, a minor adverse effect is likely. 	
SA objective 11 - Reduce the need to travel and promote more sustainable transport choices	
Decision-Aiding Questions. Will the development site...	
1. Promote mixed-use developments, in accessible locations, that reduce the need to travel and reduce reliance on the private car?	<p>It may be possible to provide a mixed-use development in this location, although the site is relatively small. There is already good access to employment, health and retail facilities which are within close proximity to the site.</p> <p>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, despite not forming publicly adopted Highway and hence the following comments are made on the basis of this access being achievable.</p>

<p>2. Provide suitable access and not significantly exacerbate issues of local transport capacity?</p>	<p>Site requires access through site being developed to the south of Cemetery Lane.</p> <p>Local Constraints: Narrowness of access routes to the Town Centre and the reliance upon private roads for vehicular access.</p> <p>Site Specific Mitigation: Access via Brooklands. Need for enhancements to Cemetery Lane route to bus stops (lighting etc and enhancement to bus stops including shelters, seating and real time information.</p> <p>Necessary Strategic Mitigation: Contributions to walking and cycling improvements in the town and towards Trowbridge.</p>
<p>3. Make efficient use of existing transport infrastructure and promote investment in sustainable transport options, including Active Travel?</p>	<p>Pedestrian/Cycle: The site has a single point of connectivity to a Highway maintainable at public expense, being Cemetery Lane. Cemetery Lane is considered very narrow, with sections below 4m in width, however the route at its south-eastern forms an active travel only route (i.e. no vehicles) to the B3107 for access to bus transit. In the opposite direction, the town centre and rail station may be accessed either via Cemetery Lane/Woolley Terrace, or via the development site on the southern side of Cemetery Lane (Brooklands), leading to Holt Road and into the Town. Holt Road is lit but is presented as a narrow carriageway supported by a single narrow footway on the northern side, i.e., directly accessible to the site. Given the narrowness of the carriageway, it is inadvisable to add additional width to the footway and hence improvements are highly unlikely. Whilst Cemetery Lane is narrow, including the vehicular used section, its use for access to the town centre is considered the most appropriate route given the low traffic usage and low traffic speeds.</p> <p>Bus: The nearest local bus stop is on the B3107 (Holt Road), via Cemetery Lane. Whilst the walk is accommodated by a lane which is restricted to vehicular traffic for its southern end, it does not present an attractive route due to limited overlooking and security, and no street lighting. To address this, the development of the site would need to be considered in coordination with enhancements to the walking route which include street lighting. These bus stops will need to be significantly enhanced with shelters, seating and real time information; these enhancements are aimed at offsetting the extended walking distance, being and given the uninviting walk to access them.</p> <p>Rail: The railway station is approximately located 1450m walk from the site, which is within the preferred maximum for a walking commute, albeit not necessarily with an onward journey, and just beyond the preferred maximum for 'elsewhere'. With the quiet roads serving the site, it is also considered reasonable to expect cyclists to make the journey to the station.</p> <p>Service Vehicles: Cemetery Lane is narrow with parking congestion, and this may present restrictions to refuse vehicle access. Notwithstanding this, it is acknowledged that surrounding houses are serviced already, and the development may not present a material capacity impact on the refuse collection route – this should be investigated. Alternative access may be drawn through Brooklands to the south, although its private status, i.e., not highway, presents difficulties of unfettered access by public services e.g., refuse trucks – such access may require a private licensing agreement.</p> <p>Car: Given the very limited width and parking congestion of Cemetery Lane, it is inadvisable to serve an additional 60+ dwellings from it. If access is achieved through Brooklands, then this addresses the concerns for vehicular access, although capacity testing of the junction onto Holt Road will need to be undertaken to determine any necessary capacity mitigation.</p>
<p>Assessment outcome (on balance): Minor adverse effect</p>	
<p>Summary of SA Objective 11</p> <ul style="list-style-type: none"> • 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, despite not forming publicly adopted Highway and hence the following comments are made on the basis of this access being achievable. • The site is in fairly close proximity to the town and railway station although improvements to walking and cycling routes will be necessary. <p>Local Constraints: Narrowness of access routes to the Town Centre and the reliance upon private roads for vehicular access.</p>	

<p>Site Specific Mitigation: Access via Brooklands. Need for enhancements to Cemetery Lane route to bus stops (lighting etc and enhancement to bus stops including shelters, seating and real time information.</p> <p>Necessary Strategic Mitigation: Contributions to walking and cycling improvements in the town and towards Trowbridge.</p> <ul style="list-style-type: none"> • Overall, a minor adverse effect is considered likely against this objective. 	
<p>SA objective 12 - Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth</p> <p>Decision-Aiding Questions. Will the development site...</p>	
<p>1. Support the vitality and viability of town centres (proximity to town centres, built up areas, station hub)?</p>	<p>Bradford on Avon town centre is situated approximately 1km to the west of this site. This is a smaller site which lacks good existing sustainable transport connectivity and opportunities to enhance connectivity may be limited due to the size of the site. The site is situated approx. 1.1km from Bradford on Avon train station.</p> <p>The site would be able to support a small amount of development most likely of either residential or employment. While the site is not large, it does have reasonably good relationship with the town centre and train station and is likely to be able to support the vitality and viability of the town centres through new users.</p>
<p>2. Provide a variety of employment land to meet all needs, including those for higher skilled employment uses that are (or can be made) easily accessible by sustainable transport including active travel?</p>	<p>The site is located approximately 1.6km from Teenwood and Elm Trading Estates. It is in close proximity to a small area of employment land along Holt Road. The site is unlikely to form a good extension to existing employment land and is unlikely to meet a range of economic needs through an employment development at this site. a small higher skilled employment development could be delivered on this site to bring forward benefits in a location where there is a limited supply of employment land. However, it is unlikely that these benefits would be very good due to the size of the site.</p> <p>Improvements to the active travel network, including to the town centre and existing employment land would need to accompany a development.</p>
<p>3. Contribute to the provision of infrastructure that will help to promote economic growth, including opportunities to maximise the generation and use of renewable energy and low-carbon sources of energy?</p>	<p>As small site, it is unlikely that a development could deliver employment alongside housing and associated infrastructure.</p> <p>There may be opportunities to consider onsite energy generation and for the site to support low carbon sources. To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources that maximises the potential for suitable development, considers identifying suitable areas for renewable and low carbon energy sources and identifies opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</p>
<p>4. Promote a balance between residential and employment development to help reduce travel to work distances?</p>	<p>The site is situated to the north-east of Bradford on Avon. Recent residential development is situated to the south of the site. A residential development in this location could support recent employment development to the south and reduce travel to work distances. However, employment land could support further job growth and lead to local employment for the Bradford on Avon community. As unemployment is low, there are risks that employment development alone could lead to an increase in in-commuting.</p>
<p>Assessment outcome (on balance): Minor positive effect</p>	
<p>Summary of SA Objective 12</p> <ul style="list-style-type: none"> • The site is located near to both residential and employment land. 	

- The site has limited access to the strategic road network, but some access to the public transport network via Holt Road and Bradford on Avon Train Station.
- The site could support existing employment land through an employment or residential development. Unlikely to support a new mixed-use development.
- New employment land alone could lead to increases in commuting.
- Overall, a minor positive effect is likely.

Site Number and SHELAA ref(s): Site 3 (SHELAA 739)

Site name: Golf Course

Site size: 6.42 ha **Site capacity:** approximate range 160 - 224 dwellings

Site description: A large site located on the eastern edge of Bradford on Avon. The site has a moderate amount of tree cover and is enclosed along the northern edge by the River Avon. The railway line lies approximately 20 m further north than the river. The south of the site is surrounded by a residential area and fields and the east of the site abuts the West Wiltshire Green Belt.

SA objective 1 - Protect and enhance all biodiversity and geological features and avoid irreversible losses

Decision-Aiding Questions. Will the development site...

<p>1. Avoid potential adverse impacts of development on local biodiversity and geodiversity?</p>	<p>The site comprises the western and central part of the former Bradford-on-Avon golf course. Land cover within the site is rough grassland with groups of trees and individual trees dividing the former green. The Bristol Avon River County Wildlife site (CWS) aligns the northern site boundary and there is a substantial tree boundary to the north along the river and along the south boundary with rear gardens of residential properties. The site has broadleaved trees / shrub / scrub along its boundaries and also scrub is encroaching across the site.</p> <p>Protection, maintenance, and enhancement should be provided for habitats such as hedgerows, trees and water features within and along the boundaries of the site alongside other ecologically valuable habitat/features. Priority habitat should be retained with wide buffer/ecological protection zones.</p> <p>A minimum of 10% net gain for biodiversity is required within individual sites (as per latest biodiversity metric) and the overall layout and design of this site should ensure that habitat creation provides connectivity to adjacent or nearby habitat areas. A net loss of biodiversity on site is likely but may be preventable if considerable enhancement / restoration of existing habitat together with creation of appropriate new habitat is undertaken.</p>
<p>2. Protect and enhance designated and non-designated sites, priority species and habitats and protected species?</p>	<p>Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) / Winsley Mines Site of Special Scientific Interest (SSSI) lies approximately 3.58km west of the site with the majority of the site lying within in the greater horseshoe bat 4km core area / consultation zone. The whole of the site lies in the 4km core area for greater horseshoe bats around the core hibernation roost for the species known as the Combined Gripwood Sites whilst the site also lies in the 2km core area around the lesser horseshoe bat core maternity roosts at Belcombe Court and the Carpenters Shop at Kingston Mills. The majority of the site also lies in the 4km core area around the greater horseshoe bat core breeding roost at Iford Manor Site of Special Scientific Interest (SSSI) and the 4km core area around the greater horseshoe bat core hibernation roost at the location known as Winsley / Murhill Rift. The western section of the site lies in the 4km core area around the greater horseshoe bat core hibernation roost at the location known as the Combined Winsley Sites.</p> <p>The Bristol Avon River County Wildlife site (CWS) aligns the northern site boundary with potential adverse effects possible during construction and operation. Furthermore, the proposed development could lead to additional visitor / recreational pressure on the CWS. Widbrook Wood Wiltshire Wildlife Trust (WWT) Reserve / County Wildlife site, bordered to north by the River Avon (Bristol Avon CWS) and to the south by the Kennet and Avon Canal CWS, lies approximately 850m southeast of the site and is accessible from the site via public footpaths. It is considered that the scale of development proposed at the potential allocation site could lead to additional visitor pressure upon and recreational use of Widbrook Wood WWT Reserve / CWS, as well as upon the Kennet and Avon Canal CWS.</p> <p>In terms of priority habitat, golf course ponds exist on the site. Following former use as a golf course, aerial imagery suggests that the grassland has diversified, and that scrub and tall ruderals have established across the site, the quality of this grassland would need to be ascertained.</p> <p>Wiltshire Council's Green and Blue Infrastructure (GBI) Strategy identifies the Bristol Avon Corridor as a Strategic GBI Corridor. Major residential development at this site would result in loss of GI alongside the River Avon, in effect extending the built environment and bringing the settlement within closer proximity to this section of the river. The northern margin and north-eastern portion of the site fall with flood zones 2 and 3 associated with the River Avon and as such retention and enhancement of the vegetation within the riparian corridor on the banks of the River Avon symbolises an opportunity. The northeast corner of the site, and the length of the boundary with the</p>

	<p>River Avon, should remain undeveloped and should form part of a wide ecological protection zone / buffer. Buffers should remain unilluminated / not subject to light spill from any adjacent development and should be retained as “dark corridors”.</p> <p>The River Avon aligning the northern boundary of the site, comprises a key flight line for a range of bat species and facilitates movement of bats through the landscape. Bats also likely commute and forage across the site whilst the eastern section of the site lies in amber risk zone for great crested newts. The mosaic of habitats on site has suitability for reptiles. There is suitable nesting habitat for birds on site whilst the site will likely also afford winter foraging opportunities for a range of species. In terms of riparian mammals, there are records of otter along the River Avon in the vicinity of the site. It’s likely that badgers will venture on to the site to forage and possibly build setts.</p>
3. Ensure that all new developments protect Local Geological Sites (LGSs) from development?	The development of the site would be unlikely to lead to impacts on designated Local Geological Sites (LGS). There are no LGS within or in close proximity to this site.
4. Aid in the delivery of a network of multifunctional Green Infrastructure?	<p>Green and blue infrastructure (GBI) incorporates a wide range of natural green and blue assets ranging from water courses, rights of way and farmland to woodland, hedgerows, street trees. Embedding GBI into well-designed built development (buildings, streets, neighbourhoods, and strategic connectivity) can help enhance the built and natural environment, facilitate biodiversity net gain, and help communities and wildlife become more resilient to climate change. On site features that could aid the delivery of a strategic network of GBI include, for example:</p> <ul style="list-style-type: none"> - River Avon corridor presents an opportunity and should remain undeveloped forming part of a wide ecological protection zone / buffer. Buffers should remain unilluminated / not subject to light spill from any adjacent development and should be retained as ‘dark corridors’. - Retention of ponds, trees, shrubs, hedgerows and associated buffers providing green corridors through the site. - Incorporation of public right of way into scheme design to create biodiverse, accessible and connected greenspaces through the development <p>In line with national policy, local plan policy and standard advice from relevant bodies, the development of the site should conserve and enhance green infrastructure and holds the potential to make suitable provision for buffers at recognised water course/green corridors.</p>

Assessment outcome (on balance): Moderate (significant) adverse effect

Summary of SA Objective 1

- The site comprises the western and central part of the former Bradford-on-Avon golf course, now largely comprising rough grassland with groups of trees and individual trees dividing the former green. The Bristol Avon River County Wildlife Site (CWS) aligns the northern site boundary and there is a substantial tree boundary to the north along the river and along the south boundary. The site has broadleaved trees / shrub / scrub along its boundaries and also scrub is encroaching across the site.
- Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) / Winsley Mines Site of Special Scientific Interest (SSSI) lies approximately 3.58km west of the site with the majority of the site lying within in the greater horseshoe bat 4km core area / consultation zone. Similarly the site, wholly or in part, lies in the 4km core area for greater horseshoe bats (Combined Gripwood Sites), the 2km core area around the lesser horseshoe bat core maternity roosts at Belcombe Court and the Carpenters Shop, the 4km core area around the greater horseshoe bat core breeding roost at Iford Manor SSSI, the 4km core area around the greater horseshoe bat core hibernation roost at Winsley / Murhill Rift and, the 4km core area around the greater horseshoe bat core hibernation roost at the Combined Winsley Sites.
- The Bristol Avon River County Wildlife site (CWS) aligns the northern site boundary with potential adverse effects possible during construction and operation alongside enhanced visitor / recreational pressure.
- Widbrook Wood Wiltshire Wildlife Trust (WWT) Reserve / CWS, bordered to north by the River Avon (Bristol Avon CWS) and to the south by the Kennet and Avon Canal CWS, lies approximately 850m southeast of the site and is accessible from the site via public footpaths. It is considered likely additional visitor pressure would result from development at the site.
- In terms of priority habitat, golf course ponds exist on the site. Following former use as a golf course, aerial imagery suggests that the grassland has diversified, and that scrub and tall ruderals have established across the site, the quality of this grassland would need to be ascertained.
- The northern margin and north-eastern portion of the site fall with flood zones 2 and 3 associated with the River Avon and as such retention and enhancement of the vegetation within the riparian corridor on the banks of the River Avon symbolises an opportunity. The northeast corner of the site, and the length of the boundary with the River Avon, should remain undeveloped and

<p>should form part of a wide ecological protection zone / buffer. Buffers should remain unilluminated / not subject to light spill from any adjacent development and should be retained as “dark corridors”.</p> <ul style="list-style-type: none"> • The River Avon aligning the northern boundary of the site, comprises a key flight line for a range of bat species and facilitates movement of bats through the landscape. Bats also likely commute and forage across the site whilst the eastern section of the site lies in amber risk zone for great crested newts. The mosaic of habitats on site has suitability for reptiles. There is suitable nesting habitat for birds on site whilst the site will likely also afford winter foraging opportunities for a range of species. In terms of riparian mammals, there are records of otter along the River Avon in the vicinity of the site. It’s likely that badgers will venture on to the site to forage and possibly build setts. • Protection, maintenance, and enhancement should be provided for habitats such as mature hedgerows and trees along the boundaries and within the site alongside other ecologically valuable habitat. Priority habitat should be retained with wide buffer/ecological protection zones. • Scope for integrated green and blue infrastructure (GBI) include opportunities presented by the River Avon corridor (with wide dark ecological protection zone / buffer) alongside the retention of on-site ponds, trees, shrubs, hedgerows and associated buffers. • A minimum of 10% net gain for biodiversity is required within individual sites (as per latest biodiversity metric) and the overall layout and design of this site should ensure that habitat creation provides connectivity to adjacent or nearby habitat areas. • Overall, a moderate adverse effect is considered likely against this objective. 	
<p>SA objective 2 - Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings</p> <p>Decision-Aiding Questions. Will the development site...</p>	
1. Ensure development maximises the efficient use of land?	It is considered that development of this site could maximise the efficient use of land. There is residential development adjacent to this site to the south that would give an indication as to the kind of densities that could be achieved here. However, the location of the site next to the river and its associated flood plain may mean that only the southern part of the site could be developed. This would reduce the potential housing capacity of the site.
2. Maximise the reuse of Previously Developed Land?	This site is greenfield which appears not to have been developed before and therefore there are no opportunities to maximise the reuse of PDL.
3. Encourage remediation of contaminated land? If so, would this lead to issues of viability and deliverability?	The whole of this site is greenfield which appears not to have been developed before. Therefore, land contamination is unlikely. However, 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.
4. Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)?	Evidence on Agricultural Land Classification (DEFRA spatial data download) shows this site as consisting wholly of Grade 3 agricultural land. However, the site was in use as a golf course so development of the site would not be taking land out of agricultural production.
5. Lead to the sterilisation of viable mineral resources? If so, is there potential to extract the mineral resource as part of the development?	This site is within the Minerals Safeguarding Area but is next to existing residential areas therefore there may be some buffering potentially for underground workings. Development of this site is not considered likely to lead to the significant sterilisation of mineral resources.
6. Support the provision of sustainable waste	There are no known reasons why sustainable waste management facilities and integrated recycling infrastructure could not be incorporated successfully into the layout and design of any development on this site. The nearest Household Recycling Centre is located in Trowbridge approximately 2.5km away.

management facilities and include measures to help reduce the amount of waste generated by development through integrated recycling infrastructure?	The site is not located within, or likely to affect a designated safeguarding zone associated with an active waste management facility, or allocated Waste Site Allocation.
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Assessment outcome (on balance): Minor adverse effect

Summary of SA Objective 2

- The location of the site next to the river may mean that only the southern part of the site could be developed. This would reduce the potential housing capacity of the site
- There are no opportunities to maximise the reuse of PDL
- Land contamination is unlikely; however, a more detailed assessment of the site would be required prior to any development coming forward
- Evidence on Agricultural Land Classification shows this site as consisting wholly of Grade 3 agricultural land. However, the site was in use as a golf course so development of the site would not be taking land out of agricultural production
- Development of this site is not considered likely to lead to the significant sterilisation of mineral resources
- Overall, given the lack of likely significant effects against this objective, a minor adverse effect is considered likely as greenfield land would still be lost in developing this site

SA objective 3 - Use and manage water resources in a sustainable manner
Decision-Aiding Questions. Will the development site...

1. Protect surface, ground and drinking water quantity/ quality?	This site is not covered by any Source Protection Zones or Drinking Water Safeguard Zones. The site is covered by a Drinking Water Protected Area. Drinking Water Protected Areas (Surface Water) are, within the Water Framework Directive, where raw water is abstracted from rivers and reservoirs. Raw water needs to be protected to ensure that it is not polluted which could lead to additional purification treatment. To do this water companies and the Environment Agency identify raw water sources that are 'at risk' of deterioration which would result in the need for additional treatment. These zones are areas where the land use is causing pollution of the raw water. Action is targeted in these zones to address pollution so that extra treatment of raw water can be avoided. Therefore, consultation with the Environment Agency would be required to understand determine the likely effects of the development. In line with the provisions of local planning policy and the Water Framework Directive, the development of this site will need to make suitable provision to protect and, where appropriate, improve local surface, ground and potable drinking water quality – this includes ensuring that enough buffer zones are located adjacent to any watercourses and ensuring that runoff does not enter these watercourses. Consideration should be given to the inclusion of Sustainable Drainage Systems to control the risk of surface water flooding from impermeable surfaces.
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2. Direct development to sites where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?	This site falls within the catchment area supplied by Wessex Water. With regard to water supply, Wessex Water have noted that a moderate amount of development on sites at Bradford-on-Avon would lead to the least amount of possible reinforcements on service infrastructure. It is likely that moderate off-site infrastructure reinforcement would be required. Minor water infrastructure crosses the site. The area covered by Wessex Water has been classed by the Environment Agency as 'seriously water stressed'. Steps will need to be taken to ensure the efficient use of water through the development and occupation of the site. With regard to foul 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 crosses the site. With regards to the impacts of surface water discharges, stringent policy criteria would be required to address potential cumulative impacts of development. Surface water must be discharged in accordance with local and national policy, and there must be no surface water connections to the foul sewer network.
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Assessment outcome (on balance): Moderate (significant) adverse effect

Summary of SA Objective 3

- The site is not covered by any Source Protection Zones or Drinking Water Safeguard Zones

<ul style="list-style-type: none"> • The site is covered by a Drinking Water Protected Area. • The area covered by Wessex Water has been classed by the Environment Agency as 'seriously water stressed'. Steps will need to be taken to ensure the efficient use of water through the development and occupation of the site. • With regard to water supply, Wessex Water have noted that a moderate amount of development on sites at Bradford-on-Avon would lead to the least amount of possible reinforcements on service infrastructure. • With regard to foul 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 crosses the site. • With regards to the impacts of surface water discharges, stringent policy criteria would be required to address potential cumulative impacts of development. • On the basis of the above evidence, a moderate adverse effect is likely. 	
SA objective 4 - Improve air quality and reduce all sources of environmental pollution Decision-Aiding Questions. Will the development site...	
1. Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration?	Development of this site is likely to lead to increased levels of environmental pollution, including noise, light and vibration – both during construction and operational phases. Road traffic noise will need to be assessed and mitigated against. Mitigation measures could feasibly be achieved onsite.
2. Reduce impacts on and work towards improving and locating sensitive development away from areas likely to experience poorer air quality due to high levels of traffic and poor air dispersal?	Bradford On Avon has an Air Quality Management Area (AQMA) in respect of the nitrogen dioxide annual mean objective. Exceedances exist on Masons Lane and Market Street and there are a number of hotspots in the town centre. Traffic from new development in this location would feed into the network of roads that uses Masons Lane and Market Street, further contributing to elevated oxides of nitrogen. If allocations at Bradford on Avon are made through the LPR then CIL/S106 contributions will be required to enable actions for the revocation of the Air Quality orders. Air Quality assessment would be required showing cumulative effects of development on relevant receptors in the AQMA in Bradford on Avon.
3. Lie within a consultation risk zone for a major hazard site or hazardous installation?	This site does not lie within a consultation risk zone for a major hazard site or hazardous installation.
Assessment outcome (on balance): Moderate (significant) adverse effect	
Summary of SA Objective 4 <ul style="list-style-type: none"> • Development of this site is likely to lead to increased levels of environmental pollution, including noise, light and vibration – both during construction and operational phases. • Bradford On Avon has an AQMA. Traffic from new development in this location could lead to further elevated levels of oxides of nitrogen, which would require mitigation. • Based on the above evidence, a moderate adverse effect is likely. 	
SA objective 5 - Minimise our impacts on climate change (mitigation) and reduce our vulnerability to future climate change effects (adaptation) Decision-Aiding Questions. Will the development site...	
1. Maximise the creation and utilisation of renewable energy opportunities, including	As this is a smaller site, it is considered that minor emissions would be produced during the construction and occupation of the site. Mitigation measures can still be applied within this objective and across the whole framework to reduce emissions. Some examples include building energy efficient buildings, generating on site renewable energy and delivering sustainable transport.

<p>low carbon community infrastructure such as district heating?</p>	<p>It would be possible for a development of this scale to include renewable energy generation; however, this would mainly be within buildings rather than areas of open space. There is no existing district heating network for this site to link into.</p> <p>To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources from developers, that maximises the potential for suitable development, considers identifying suitable areas for renewable and low carbon energy sources and identifies opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</p>
<p>2. Be located within Flood Zones 2 or 3? If so, are there alternative sites in the area within Flood Zone 1 that can be allocated in preference to developing land in Flood Zones 2 or 3?</p>	<p>Most of the site is in Flood Zone 1. The northern boundary of this site runs along the embankment of the River Avon and is within flood zone 2 and 3, "more vulnerable" development such as housing may be unsuitable, subject to the exception test. 11% of the site is in flood zone 2. Wide buffer zones should be left adjacent to the River Avon to enhance biodiversity and Green/Blue Infrastructure. This would result in the loss of developable land.</p>
<p>3. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere?</p>	<p>There is a medium groundwater risk across 13% of the site. This means that groundwater is 0.25-0.5 m below the ground surface. High groundwater levels could impact infiltration techniques, drainage, construction activities and flood risk, therefore site-specific groundwater investigations will be required. There is a low risk of surface water flooding on 4% of the site. There is a medium risk of surface water/groundwater flooding on 3% of the site. There is a high risk of surface water flooding on 2% of the site. Cumulative impacts have been scored medium. More stringent policy with regards the control of surface water discharges from new development is required.</p> <p>The site will require a Flood Risk Assessment to ensure there is no flood risk to site and that development of this site won't exacerbate Flood Risk elsewhere. Cumulative impacts have been scored medium. More stringent policy with regards the control of surface water discharges from new development is required. The site will require a Flood Risk Assessment to ensure there is no flood risk to site and that development of this site won't exacerbate flood risk elsewhere.</p>
<p>4. Promote and deliver resilient development that is capable of adapting to the predicted effects of climate change, including increasing temperatures and rainfall, through design e.g. rainwater harvesting, Sustainable Drainage Systems, permeable paving etc?</p>	<p>Plans for developing this site should take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for flood risk, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. It is considered that any future development of this site could incorporate appropriate measures to adapt to the predicted future impacts of climate change. The location, layout and design of any new development should be planned to avoid increased vulnerability to the range of impacts predicted to arise from climate change, including flood risk, water supply and changes to biodiversity and landscape. This site is located less than 1 km from the town centre, enabling active travel to the town centre and ease of access to public transport.</p> <p>It is anticipated that Wiltshire will experience hotter summers, milder winters, increased periods without rain, increased intensity in rainfall and more extreme weather events. Development would need to include adaptation measures such as designing to prevent overheating, heat resistant landscaping, more resilient foundations, drought resistant planting and for generally more resilient buildings and spaces (general design and robust materials).</p> <p>As this is a small site in, there may not be much provision for large areas of Green Infrastructure, however there will be less greenfield land lost. Enough land would need to be set aside for robust surface water management, to include comprehensive surface water drainage measures (including SuDS) that result in run-off rates equalling or bettering current greenfield infiltration rates. Some SuDS may be difficult to implement due to high groundwater levels.</p>

Assessment outcome (on balance): Minor adverse effect

Summary of SA Objective 5

- Most of the site is in Flood Zone 1.
- The northern boundary of the site runs along the embankment of the River Avon which does present a fluvial risk.

- There is a medium groundwater risk across 13% of the site. This could inhibit the use of some SuDS.
- Flood risk could be exacerbated by climate change. Although development could avoid this area and avoid risk, it may worsen the risk elsewhere.
- Cumulative impacts have been scored medium. More stringent policy with regards the control of surface water discharges from new development is required.
- It would be possible for this development to include renewable energy generation, however there may be limited opportunity to use open space as this is a smaller site. It is considered that any future development could incorporate appropriate measures to adapt to the predicted future impacts of climate change.
- Although the size of this site may not lend itself to large amounts of renewable energy opportunity, it also has the potential to produce less greenhouse gas emissions than a larger site. These emissions could be reduced through the design and layout of the site, by ensuring high levels of energy efficiency in all new buildings to reduce energy use, through mixed-use development that can reduce the need to travel and by ensuring as much choice and access as possible to efficient and reliable sustainable modes of transport.
- Overall, this is a smaller site which should produce fewer emissions than a larger one. It is considered that there are opportunities to support resilient development, which supplies energy efficient buildings and provides investment in renewable energy. New development could be in Flood Zone 1 however a buffer would need to exist next to the river. Given the risk to the parts of the site and loss of greenfield land which thus natural drainage, a minor adverse effect is likely.

SA objective 6 - Increase the proportion of energy generated by renewable and low carbon sources of energy

Decision-Aiding Questions. Will the development site...

1. Support the development of renewable and low carbon sources of energy?	<p>As this is a medium site, there may be some space available for opportunities to support energy generation from renewable and low carbon sources. There may still be opportunities for renewable energy generation on a smaller scale, for example, solar panels on roofs. To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources from developers, that:</p> <ul style="list-style-type: none"> • maximises the potential for suitable development. • considers identifying suitable areas and options for renewable and low carbon energy sources; and • identifies opportunities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply systems and for co-locating potential heat customers and suppliers.
2. Be capable of connecting to the local Grid without the need for further investment?	<p>The electricity infrastructure is constrained across much of Wiltshire. The Grid Supply Points in Wiltshire, located in Minety and Melksham are both constrained. The Bulk Supply Points across Wiltshire are also constrained.</p> <p>Due to the uptake of low carbon technology, and the move towards net zero, the Climate Change Committee have estimated that energy demand could almost treble by 2050. This increased pressure on the system is something SSEN, as Distribution Systems Operator, is working on to manage new system capacity. Solutions may include flexible connections, renewable energy, and further investment to reinforce the current infrastructure. Early engagement with SSEN may be required to discuss connections issues and new solutions may be required.</p> <p>As this is a medium site, there would be a moderate demand on the current infrastructure. According to SSEN's generation availability map, the substation in Braford on Avon is constrained, therefore could potentially struggle to withstand additional energy generation connections to the grid, if the site were to produce its own energy. According to SSEN's Network Capacity (demand) Map, the substation in Bradford-on-Avon is constrained, therefore could potentially struggle to withstand further significant demand. Further conversation with SSEN would be required to ensure connectivity to the grid.</p> <p>It is not known how the site will be brought forward - if the site was able to support its own renewable energy, then the site would be less likely to depend on the grid, however it is considered that this site may struggle to allocate much open space for renewables.</p>
3. Create economic and employment opportunities in sustainable green technologies?	<p>It is considered that a site of this size could provide moderate economic and employment opportunities in sustainable green technologies. There may be parts of the site that could be suitable for renewable and low carbon energy sources and supporting infrastructure however it is considered that most of the site will be used for development to improve viability. With less renewable energy generation on site there are fewer possibilities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply systems onsite and for co-locating potential heat customers and suppliers. However, being a medium site there will be a moderate energy demand.</p>

4. Deliver high-quality development that maximises the use of sustainable construction materials?	It is considered that development of this site would be able to deliver a high-quality development that makes maximum use of sustainable construction materials throughout the development.
5. Deliver energy efficient development that exceeds the minimum requirements set by Building Regulations?	It is considered that development of this site would be able to deliver an energy efficient development that exceeds minimum requirements set by Building Regs. However, this will need to be factored into the increased demand the site will have on the existing infrastructure.
Assessment outcome (on balance): Neutral effect	
<p>Summary of SA Objective 6</p> <ul style="list-style-type: none"> • It is considered that a site of this size could support medium-scale renewable energy generation or create economic and employment opportunities in sustainable green technologies as there is limited space available. It would still be possible to generate renewable energy on a smaller scale. • There will need to be a positive strategy for energy from renewable sources from developers for example, solar panels. • New developments should consider incorporating electric vehicle charging points, which will encourage the use of more sustainable modes of transport but will increase the energy demand of the site. • As this is a medium site, energy demand will be less than a larger site. • It is considered that the current energy infrastructure in Bradford-on-Avon is constrained and could struggle to cope with the increased demand of this site. Early conversations with SSEN will be required for this site. Overall, given that this is a smaller site, energy demand will be less than that of a larger site. There may be opportunities for small scale renewable energy generation, and there is potential for this site to provide electric vehicle charging points, which would encourage more sustainable car use, therefore a neutral effect is considered likely against this objective. 	
<p>SA objective 7 - Protect, maintain and enhance the historic environment Decision-Aiding Questions. Will the development site...</p>	
1. Conserve and enhance World Heritage Sites, Scheduled Monuments, Listed Buildings, the character and appearance of Conservation Areas, Historic Parks & Gardens, sites of archaeological interest and, where appropriate, undesignated heritage assets and their settings?	<p>There are no designated assets affected.</p> <p>The site is located within 100m of World War II 20th century pill box which is separated from the site by the river and is of very low archaeological value. Despite the absence of identified archaeological remains in the site and buffer zone, further investigation is required to establish the true extent of archaeological potential. Based on evidence that is currently available and known, the site appears to be not heavily constrained by archaeological remains – this could change following investigation. The site has not been subject to archaeological investigation; therefore, further investigation is likely needed to identify the presence and significance of as yet unknown archaeological remains across the site. Following this, depending on the significance of any remains found, mitigation could include avoidance of high value archaeological remains or preservation by record. Following the application of suitable mitigation strategies, the potential for significant adverse archaeological effects is low.</p> <p>The site is characterised as a modern 21st century golf course that has removed all remains of prior landscape legibility and does not have highly sensitive historic landscape features. The site comprises part of a wider network of weak continuity, where landscape character has been subject to change. Overall, the site is not heavily constrained by historic landscape character. No mitigation strategy identified at this stage. Following the application of suitable mitigation strategies, the potential for significant adverse historic landscape effects is very low.</p>

2. Maintain and enhance the character and distinctiveness of settlements through high quality and appropriate design, taking into account, where necessary, the management objectives of Conservation Areas?	<p>In accordance with national policy/local policy, the development of the site for housing could deliver housing that maintains and enhances the distinctiveness of settlements through high quality design. No details of any potential future development scheme or design and layout are currently known. Development of the site would have the potential to appropriately protect and enhance designated heritage assets according to their significance.</p> <p>The site adjoins conservation area (CA) and would lead to an impact on designated conservation area. The need to respect the setting of the CA (development likely to be required to be restricted to previously built area) is likely to reduce capacity of site.</p>
Assessment outcome (on balance): Minor adverse effect	
<p>Summary of SA Objective 7</p> <ul style="list-style-type: none"> • There are no designated conservation assets affected. • The potential for significant adverse archaeological effects is low. • The potential for significant adverse historic landscape effects is very low. • The site adjoins a conservation area. • Overall, a minor adverse effect is likely. 	
<p>SA objective 8 - Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.</p> <p>Decision-Aiding Questions. Will the development site...</p>	
1. Minimise impact on and, where appropriate, conserve and enhance nationally designated landscapes e.g. National Parks and AONBs and their settings?	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. Development will need to be sensitive to these designated landscapes/features.
2. Minimise impact on, and enhance, locally valued landscapes through high quality, inclusive design of buildings and the public realm?	<p>The site is located in the east of Bradford-on-Avon, north of Mythern Meadow and south of the River Avon. It is situated on the gently sloping banks to the south of the River Avon, rising from approximately 30m AOD in the north of the site to approximately 50m in the southwest of the site. The River Avon forms the north site boundary. The site itself comprises the western and central part of the former Bradford-on-Avon golf course. Land cover within the site is rough grassland with groups of trees and individual trees dividing the former green. There is a substantial tree boundary to the north along the river and along the south boundary with rear gardens of residential properties. There is a small area of allotments within the southwest of the site. The settlement edge is generally well-integrated and softened by trees within the site and along the River Avon. New development to the north of the site, on the opposite side of the River Avon forms a prominent built edge at the top of the riverbank slopes. The site forms part of an undesignated landscape that contains relatively ordinary components. The site has value as green space, which is well connected to public footpaths and the River Avon behind residential properties. It is part of a relatively simple, rural landscape that is in generally moderate condition and has some local scenic qualities particularly associated with the river corridor. The site forms part of the settlement fringe that is generally well integrated and contributes to the sense of place associated with the treed banks of the River Avon.</p> <p>Overall, the site is of generally medium to high landscape sensitivity to development, due to its contribution to set back of the settlement from the River Avon corridor through the town. The site has generally medium to limited capacity to accommodate development.</p> <p>Potential for significant adverse effects include the following:</p> <ul style="list-style-type: none"> • Potential for built form to be conspicuous and form a prominent settlement edge on rising slopes south of the River Avon.

	<ul style="list-style-type: none"> • Potential for built form to encroach on the blue/green corridor of the River Avon that links through the town. • Potential loss of vegetation features including groups of and individual trees that contribute to the generally well-integrated settlement edge. <p>Scope for mitigation includes the following:</p> <ul style="list-style-type: none"> • Limit development heights to restrict the prominence of built form in the rural landscape. • Avoid development that does not respect the scale, setting and form of the existing settlement. • Limit development in the north of the site to maintain the setting of the river corridor and provide a strong landscape buffer to the urban settlement edge. • Retain trees as part of a mature landscape framework.
3. Protect and enhance rights of way, public open space and common land?	There are various informal footpaths through the site, which link with public footpaths along the south of the site, between the residential suburb and southeast to the River Avon and Kennet and Avon Canal. The site is an enclosed public green space that forms the existing settlement edge.
Assessment outcome (on balance): Moderate (significant) adverse effect	
<p>Summary of SA Objective 8</p> <ul style="list-style-type: none"> • 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. • The site itself comprises the western and central part of the former Bradford-on-Avon golf course. Land cover within the site is rough grassland with groups of trees and individual trees dividing the former green. • The site has value as a green space, which is well connected to public footpaths and the River Avon behind residential properties. It is part of a relatively simple, rural landscape that is in generally moderate condition and has some local scenic qualities particularly associated with the river corridor. • It is considered that the site is of generally medium to high landscape sensitivity to development, due to its contribution to set back of the settlement from the River Avon corridor through the town. The site has generally medium to limited capacity to accommodate development. • Overall, a moderate adverse effect is considered likely against this objective. 	
SA objective 9 - Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures	
Decision-Aiding Questions. Will the development site...	
1. Provide an appropriate supply of affordable housing?	The record of housing delivery at Bradford on Avon to date has been in line with planned levels over the WCS plan period. The site is subject to some variable topography at its boundaries which may limit the developable area and number of homes to be delivered. Notwithstanding any mitigation that may be required which results in a reduced developable area, the development range for this site means that it has potential to deliver a small number of affordable homes. This could contribute, either alone or in combination with other sites, to the delivery of affordable housing at Bradford on Avon.
2. Support the provision of a range of house types and sizes to meet the needs of all sectors of the community?	Should this smaller site be developed for residential uses, and notwithstanding any mitigation that may be required which results in a reduced developable area, it has the potential to provide for a range of housing needs and types. The site has the potential to deliver a range of high-quality, sustainable homes of different types and tenures, which would be beneficial to addressing identified local housing needs.
Assessment outcome (on balance): Minor positive effect	
<p>Summary of SA Objective 9</p> <ul style="list-style-type: none"> • Notwithstanding any mitigation that may be required which results in a reduced developable area, this smaller site could bring forward a small amount of affordable housing as part of a housing development. • The site would be likely to support a range of house types, tenures and sizes to meet different needs. 	

<ul style="list-style-type: none"> • Overall, a minor positive effect is considered likely against this objective. 	
SA objective 10 - Reduce poverty and deprivation and promote more inclusive communities with better services and facilities Decision-Aiding Questions. Will the development site...	
1. Maximise opportunities for affordable homes and job creation within the most deprived areas?	<p>The Indices of Multiple Deprivation (IMD) 2019 identify this site as being situated in an area of more deprivation relative to other areas in Bradford on Avon. Development at this site has the potential to create new homes and jobs towards a more deprived area.</p> <p>The site has the potential to deliver up to 224 homes of different types and tenures. This site could deliver an amount of affordable housing.</p> <p>Overall, there could be social and economic benefits for the Bradford on Avon area through housing provision, short-term construction jobs and a larger workforce for local businesses.</p>
2. Be accessible to educational, health, amenity greenspace, community and town centre facilities which are able to cope with the additional demand?	<p>Bradford on Avon town centre is situated approximately 0.8km to the north-west of this site. This is a reasonably sized site, which is subject to some existing sustainable transport connections. The site comprises an informal recreational greenspace, which was previously in use as a golf course. The Strips, Poulton Playing Fields and Spencer Moulton Bowls Club are all within 1km of the site and provide formal and informal recreation opportunities.</p> <p>Housing development at this site could generate the need for 21-29 early years places, 50-69 primary school places and 35-49 additional secondary places. Financial contributions would be required in to create additional early years places and potentially land would also be required to bring forward a new nursery. Expansion of the local primary schools and the secondary school would also be required.</p> <p>There is only one GP surgery at Bradford on Avon. The site is less than 1km from GP provision in Bradford on Avon. There are major issues with the GP practice and new development should look to support new build health provision. The site could make some contribution to the improvement of health services in the area and is large enough to consider the inclusion of a health centre alongside development. Accessibility to the site from patients on the west of the town could render this undesirable, however. Nonetheless, contributions could help to avoid adverse impacts on local health services, although there remains some risk of placing more pressure on existing health provision issues in the area. Financial contributions are to be sought through development to ensure new residents have access to healthcare facilities.</p>
3. Promote/create public spaces and community facilities that support public health, civic, cultural, recreational and community functions?	<p>The site is subject to existing trees and serves the existing community as an informal public open space. This, along with the existing vegetation and the apparencey of the River Avon to the north of the site, suggest ample opportunities to incorporate recreational greenspace into a new development. However, development in this location could likely lead to a loss of existing greenspace onsite if this were not replaced with new offsite facilities. The site is bounded by open countryside to the east so similar opportunities for informal use by the local community may continue to exist without replacement of the current greenspace. There may be some potential for a development to incorporate a community use to complement develop given the opportunities for onsite recreation.</p>
4. Reduce the adverse impacts associated with rural isolation, including through access to affordable local services for those living in rural areas without access to a car?	<p>Development of this site would extend Bradford on Avon to the east and development could abut the Green Belt Boundary and the River Avon to the north. Given that the site would predominately serve Bradford on Avon and that it has little relation to rural communities to the east of Bradford on Avon, it would make a minimal contribution to reducing rural isolation.</p>
Assessment outcome (on balance): Minor adverse effect	
Summary of SA Objective 10 <ul style="list-style-type: none"> • Development at this site could help to direct new homes and jobs towards an area subject to more deprivation. • Site is likely to provide an amount of affordable homes as part of a housing development. • The site has connectivity to the town centre and some existing connectivity through sustainable transport modes. 	

<ul style="list-style-type: none"> • Amenity greenspace could be incorporated into a development but could lead to the loss of informal recreational greenspace. • Early years, primary and secondary schooling provision could be met through new provision and through the creating of additional provision at existing facilities. • Accessibility to existing health care provision is good, however additional houses in the area could adversely affect existing GP capacity in a location where there are existing issues. Financial contributions from a housing development would be necessary to avoid negative impacts on health services through an increase in patients and opportunities to incorporate a new facility onsite or support offsite provision should be explored in ensuring that adverse impacts are avoided. • The site would be unlikely to support the onsite provision of community facilities but could make some contribution to reducing rural isolation. • Overall, a minor adverse effect is likely. 	
SA objective 11 - Reduce the need to travel and promote more sustainable transport choices Decision-Aiding Questions. Will the development site...	
1. Promote mixed-use developments, in accessible locations, that reduce the need to travel and reduce reliance on the private car?	<p>It may be possible to provide a mixed-use development in this location, although the site is relatively small.</p> <p>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. This site has the opportunity to maximise walking and cycling access to the town centre.</p>
2. Provide suitable access and not significantly exacerbate issues of local transport capacity?	<p>Local Constraints: Access through an existing estate with required active travel mitigation and capacity of access points onto Trowbridge Road.</p> <p>Site Specific Mitigation: Enhancements of public rights of way through woodland and along metalled paths into the own Centre to maximise pedestrian, cycling.</p> <p>Necessary Strategic Mitigation: Limited opportunity for direct delivery of strategic mitigation. Contributions to public rights of way enhancements to access the canal towpath and enhancements within the town.</p>
3. Make efficient use of existing transport infrastructure and promote investment in sustainable transport options, including Active Travel?	<p>The key to unlocking this development scheme is to maximise the footway/cycleway links through the woods to the town centre and eastwards towards the canal path leading to Trowbridge. Some of this active travel access strategy will require negotiations with landowners, particularly for access eastwards.</p> <p>Pedestrian/Cycle: Towards the Town Centre, there is a combination of existing recreational public rights of way that penetrate through the woods alongside the river and tarmac footways that follow Greenland View and to the rear of Upper Regents Park to St Margarets Hill. It is considered that each of the routes may be enhanced with those through the woods retaining their seasonal and recreational use, taking into consideration the environment in which they sit, and the metalled footways increased in width; the latter would need to be investigated against definitive plan width and adjacent land availability. This may require some hedgerow removal but would increase visibility of the woodland walks. It is also considered that elements of these routes may be sufficient to accommodate cyclists and this would significantly reduce the journey time into the town centre.</p> <p>With regards to access through the adjacent estate to Trowbridge Road, the streets follow a typical carriageway bounded by footway design. Where the verge is present, the opportunity exists to widen the footways to a standard 2m width; there is the potential for greatly widened footways to accommodate cyclists by maximising the provision on one side, but this will involve relocating the carriageway which will have implications for drainage and services which this will be too costly for the scale of development.</p> <p>Towards Trowbridge, BRAD 18 leads to Holt 62 and Holt 63 public rights of way across open countryside. Holt 63 is presented as the Kennet and Avon Canal tow path and leads directly into Canal Road Industrial Estate and via a linking route along the rail line towards the town centre and the Station. Opportunities to surface the route to Holt 63 will need to be explored as this would significantly enhance active travel connectivity between the towns.</p>

	<p>Bus: Bath Road appears relatively well served by existing bus services, with bus stops within 400m. Additional bus stops on the A361 are available within 600m from the centre of the site and these accommodate an hourly service between Bath and Trowbridge and Bath and Salisbury.</p> <p>Rail: The rail station is located approximately 1km walk from the centre of the site accommodating destinations to Trowbridge, Bath, Warminster and Salisbury all within 45 minutes.</p> <p>Service Vehicles: The site would be served from the adjacent estate which itself is serviced by refuse trucks etc. In this regard, providing the site can be sustainably accommodated on the existing refuse route it should not generate additional large vehicle movements.</p> <p>Car: Direct access to the site is achievable via the estate roads from Trowbridge Road. Whilst typical thresholds of 300 dwellings per access point are exceeded with the existing housing and additional development, initial capacity analysis illustrates that this may not be a constraint for the level of development intended.</p>
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Assessment outcome (on balance): Minor adverse effect

Summary of SA Objective 11

- 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. This site has the opportunity to maximise walking and cycling access to the town centre.
- The key to unlocking this development scheme is to maximise the footway/cycleway links through the woods to the town centre and eastwards towards the canal path leading to Trowbridge.
- The site is in fairly close proximity to the town and railway station although contributions will be sought for public rights of way enhancements to access the canal towpath and enhancements within the town.

Local Constraints: Access through an existing estate with required active travel mitigation and capacity of access points onto Trowbridge Road.

Site Specific Mitigation: Enhancements of public rights of way through woodland and along metalled paths into the town Centre to maximise pedestrian, cycling.

Necessary Strategic Mitigation: Limited opportunity for direct delivery of strategic mitigation. Contributions to public rights of way enhancements to access the canal towpath and enhancements within the town.

- Overall, a minor adverse effect is considered likely against this objective.

SA objective 12 - Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth
Decision-Aiding Questions. Will the development site...

1. Support the vitality and viability of town centres (proximity to town centres, built up areas, station hub)?	<p>Bradford on Avon town centre is situated approximately 0.8km to the north-west of this site. This is a reasonably sized site, which is subject to some existing sustainable transport connections. The site is situated approx. 0.7-1.2km from Bradford on Avon train station.</p> <p>The site would be able to support a small amount of development most likely of either residential or employment. While the site is not large, it does have reasonably good relationship with the town centre and train station and is likely to be able to support the vitality and viability of the town centres through new users.</p>
2. Provide a variety of employment land to meet all needs, including those for higher skilled employment uses that are (or can be made) easily accessible by sustainable transport including active travel?	<p>The site is located within 1km of employment land at Teenwood and Elm Trading Estates. The site is situated near to a small area of employment land along Holt Road. The site is unlikely to form a good extension to existing employment land but has the potential to deliver a larger development to meet a range of employment needs. The site lacks good access to the strategic road network but could attract some higher skilled employment due to reasonably good access to the railway network. These benefits are likely to be limited due to the size of the site, however.</p> <p>Improvements to the active travel network, for example the enhance of BRAD32 or along the Avon corridor to improve access to the town centre, in addition to improved connectivity across the site would need to accompany a development to ensure the promotion of sustainable transport options.</p>

<p>3. Contribute to the provision of infrastructure that will help to promote economic growth, including opportunities to maximise the generation and use of renewable energy and low-carbon sources of energy?</p>	<p>As small site, it is unlikely that a development could deliver employment alongside housing and associated infrastructure.</p> <p>There may be opportunities to consider onsite energy generation and for the site to support low carbon sources. To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources that maximises the potential for suitable development, considers identifying suitable areas for renewable and low carbon energy sources and identifies opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</p>
<p>4. Promote a balance between residential and employment development to help reduce travel to work distances?</p>	<p>The site is situated to the east of Bradford on Avon. Recent residential development is situated to the north of the site, beyond the railway line. A residential development in this location could support recent employment development to north or existing employment land at Teenwood and Elm Trading Estates, reducing travel to work distances. However, employment land could support further job growth and lead to local employment for the Bradford on Avon community. As unemployment is low, there are risks that employment development alone could lead to an increase in in-commuting.</p>

Assessment outcome (on balance): Minor positive effect

Summary of SA Objective 12

- There is relatively good connectivity from the site to the town centres.
- The site is located near to both residential and employment land.
- The site has limited access to the strategic road network, but some access to the public transport network, including Bradford on Avon Train Station.
- The site could support existing employment land through an employment or residential development. Unlikely to support a new mixed-use development.
- New employment land alone could lead to increases in commuting.
- Overall, a minor positive effect is likely.