

Trowbridge Housing Market Area (HMA) - Assessment of Alternative Development Strategies (Standard Method)

- **Strategy TR – A (Current Strategy)** – Rolling forward the Core Strategy
- **Strategy TR – B (Westbury Growth Point)** – housing led by growth forecast at Westbury (1,940 homes), growth at Core Strategy rates at Warminster (no change) and Bradford on Avon assessed needs i.e. -4%. Consequential reductions at Trowbridge but still focus for growth (4,920).
- **Strategy TR – C (Greater Rural Focus)** - rest of HMA aligned to past rates of housing (1,095 homes). Warminster reflects assessed needs i.e. -4% and Westbury continues at Core Strategy rates. Reduced at Trowbridge (5,585) and Bradford on Avon (275).

Proposed distribution of housing and employment requirements – Trowbridge HMA						
Settlement	Strategy TR – A (Current Strategy)		Strategy TR – B (Westbury Growth Point)		Strategy TR – C (Greater Rural Focus)	
	Housing	Employment	Housing	Employment	Housing	Employment
Bradford on Avon	520	1	520	0	275	0
Trowbridge	5940	0	4920	0	5585	0
Warminster	1675	0	1775	0	1675	0
Westbury	1305	0	1940	1	1395	0
Rest of HMA	580	0	865	0	1095	1
TOTAL	10020	1	10020	1	10025	1

Sustainability Appraisal Objective 1: Protect and enhance all biodiversity and geological features and avoid irreversible losses.

Decision-Aiding Question (DAQ) 1: Avoid potential negative impacts of development on designated wildlife sites, protected species and priority species and habitats (international, national, local) and enhance these where possible?

Bradford on Avon is located within the Consultation Zone of the Bath and Bradford on Avon Special Area of Conservation (SAC) providing key habitat for hibernation, breeding, foraging and commuting bats for Annex II bat species. Activities which occur in these designated sites and even some distance from them may damage important elements of the network and disrupt population dynamics. There is one SSSI in the area (Gripwood Quarry) and several County Wildlife Sites (CWS) within close proximity to the town.

The landscape surrounding **Trowbridge** is known to be of high importance for bats, supporting at least 14 of the 18 UK bat species. Trowbridge is located within the Consultation Zone of the Bath and Bradford on Avon Special Area of Conservation (SAC) providing key habitat for Annex II species, particularly Bechstein's. In particular, woodlands to the east and south east of Trowbridge (Biss Wood, Green Lane Wood and Clanger and Picket Wood) are known to support a large and internationally-significant breeding meta-population of Bechstein's bat. Picket and Clanger Wood is the only designated SSSI in close proximity to the town. There are four County Wildlife Sites, including Bliss Wood, Flowers Wood, East Flowers Wood, Green Lane Wood and Meadow and Smith's Well Wood, Kettle Lane Wood, and Wiildbrook Wood and Biss Meadows Country Park.

The town of **Westbury** is also located within the Consultation Zone of the Bath and Bradford on Avon Special Area of Conservation (SAC) providing key habitat. It is within 1.3km of the Salisbury Plain SAC, SPA. The town is within the visitor catchment of the Salisbury Plain SPA. There are three SSSI within close proximity to Westbury, including Salisbury Plain SSSI, Bratton Downs SSSI and Upton Cow Down SSSI. There are 12 County Wildlife Sites located within the vicinity of the town (Westbury Lakes, White Scar Hanging, White Scar Hanging Chalk, Chalcot Wood, Farmers Hill, Black Dog Woods North, Fairwood House Marsh, Fairwood Road Railway Line, Round Wood, Brokerswood and Hazel Wood, Bratton Chalk and Bratton down Quarry).

In **Warminster**, phosphates in relation to the River Avon SAC, which is also a main contributor to habitat connectivity, have been identified as a potential issue relating to increased growth in the settlement. Furthermore, the Bath and Bradford on Avon SAC buffer lies to the immediate north of the settlement and Salisbury Plain to the east and south. Some areas around Warminster lie within the visitor catchment of the Salisbury Plain SPA and are therefore at risk of recreation pressure.

Some areas in the **Rest of the HMA** are designated as SSSIs, lie within the buffer zones of SACs and SPAs, or contain important habitats including ancient woodland.

DAQ 2: Ensure that all new developments protect Local Geological Sites (LGSs) from development?

Westbury is the only settlement in the Trowbridge HMA in proximity to an LGS (formerly Regional Sites of Geological Importance, or RIG) with sites lying on the eastern side of the settlement towards Bratton and Edington.

DAQ 3: Aid in the delivery of a network of multifunctional Green Infrastructure?

The design of developments may incorporate measures to enhance biodiversity and contribute to networks of multifunctional green space known as green infrastructure. The preparation of a Green Infrastructure (GI) Strategy will help to provide a long-term vision and strategic framework to aid the delivery of GI. However, at this stage of the process, it is not possible to comment on the likelihood of GI being adopted as part of development.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	The Core Strategy Continued proposes relatively low levels of growth for Bradford on Avon. The town has a high degree of ecological sensitivity.	The level of growth proposed is commensurate with Core Strategy Continued (excluding 1 Ha of Employment Land). Bradford on Avon has a high degree of ecological sensitivity.	The level of growth proposed is low and significantly lower than the Core Strategy Continued. It is considered that this may be able to be accommodated on a specific site(s) at the town without significant adverse effects, given careful site selection and mitigation.

	This level of additional growth is likely to lead to moderate adverse effects.	This level of additional growth is likely to lead to moderate adverse effects.	Overall, minor adverse effects are considered likely given this lower level of growth.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Trowbridge	The Core Strategy Continued proposes the highest quantum of growth for Trowbridge. The town has a high degree of ecological sensitivity which would make accommodating additional housing on this scale challenging. Therefore, moderate adverse effects are likely.	This strategy directs the lowest quantum of growth, significantly lower than the Core Strategy Continued. However, Trowbridge has a high degree of ecological sensitivity which would make accommodating additional housing on this scale challenging. Therefore, moderate adverse effects are likely.	Strategy TR-C proposes a moderately high growth quantum for the town. The town has a high degree of ecological sensitivity which would make accommodating additional housing on this scale challenging. Therefore, moderate adverse effects are likely.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	At Warminster, whilst Core Strategy Continued proposes a moderately low growth quantum, moderate adverse effects on biodiversity in relation to the River Avon SAC and Salisbury Plain SPA could occur, dependent on the location of development.	At Warminster, despite TR-B proposing higher growth compared to Core Strategy Continued, moderate adverse effects on biodiversity in relation to the River Avon SAC and Salisbury Plain SPA could occur, dependent on the location of development.	At Warminster, despite this strategy proposing a low amount of growth – comparable with Core Strategy Continued - moderate adverse effects on biodiversity in relation to the River Avon SAC and Salisbury Plain SPA may occur depending on the location of development.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Westbury	The Core Strategy Continued proposes the lowest quantum growth for Westbury. Westbury is relatively unconstrained with regards to ecological statutory designations. The key issue is the south of Westbury is within the visitor catchment of the Salisbury Plain SPA, therefore development could lead to additional recreational pressures. Development could also have some localised impacts on other habitats in the short-term. Minor adverse ecological effects may occur depending on the proximity of development to areas which pose a risk to biodiversity.	This option proposes the highest level of growth and considerably higher than the Core strategy Continued. Westbury is relatively unconstrained with regards to ecological statutory designations. The key issue is the south of Westbury is within the visitor catchment of the Salisbury Plain SPA, therefore development could lead to additional recreational pressures. Development could also have some localised impacts on other habitats in the short-term. There are uncertainties regarding likely effects on biodiversity overall but given this increase in growth rates, moderate adverse effects would be anticipated.	This strategy proposes a level of growth slightly higher than the Core Strategy Continued. As a result, minor adverse ecological effects may occur depending on the proximity of development to areas which pose a risk to biodiversity.
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	Due to the broad geographical area covered by Rest of HMA, it may be possible for development to avoid areas of biodiversity sensitivity. However as at this stage no sites have been identified, minor adverse effects on this objective are deemed likely.	Due to the broad geographical area covered by Rest of HMA, it may be possible for development to avoid areas of biodiversity sensitivity. However as at this stage no sites have been identified, minor adverse effects on this objective are deemed likely.	This option includes a significantly higher level of growth in the rest of the HMA than TR-A and TR-B. Therefore, it is more likely that development will impact on areas of biodiversity sensitivity. It may be possible for development to avoid significant adverse effects with this higher level of growth, but impacts are likely to be greater than TR-A and TR-B. Minor effects likely overall.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse

Overall HMA score	-1.6 TR-A is likely to lead to moderate adverse effects due to the potential impact of additional development on Annex II bat species, particularly at the settlements of Trowbridge and Bradford on Avon.	-1.8 TR-B is likely to lead to moderate adverse effects due to the potential impact of additional development on Annex II bat species, particularly at the settlements of Trowbridge and Bradford on Avon.	-1.4 Overall, considering the assessment of all settlements/areas, this strategy is likely to have minor adverse effects on this objective.
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Conclusions/Recommendations:

- Given scoring overall across the various settlements/areas, strategy **TR-C is considered the most sustainable option** against this objective with the least number of settlements likely to have significant adverse effects from proposed levels of development. Trowbridge and Warminster are considered likely to have moderate adverse effects with mitigation problematic, however mitigation is considered possible if careful consideration is given to the location of any new development and associated infrastructure, and a biodiversity net gain is achieved on all sites.
- **Strategy TR-B is considered the least sustainable strategy** with the potential for likely significant adverse effects at Trowbridge, Bradford on Avon, Westbury and Warminster due to the ecological constraints they have.
- Biodiversity issues in the Trowbridge HMA are mainly focussed on protecting Annex II bat species due to the internationally designated Bath and Bradford on Avon Bats SAC, impacts on the River Avon SAC at Warminster and the proximity of the Salisbury Plain SAC/SPA to Westbury and Warminster.
- Bradford on Avon is an important area for bats given its close proximity to the SAC. Moderate adverse effects are likely in the settlement for the two strategies that propose the highest levels of growth. However, adoption of proposed recommendations could mitigate adverse effects.
- Significant growth at Trowbridge may have impacts on the habitats of the Annex II bat species associated with the Bath and Bradford on Avon Bats SAC, particularly due to recreational impacts on nearby woodlands. While Trowbridge is less constrained than Bradford on Avon with regards to the Bath and Bradford on Avon Bats SAC, levels of growth at the settlement proposed across all strategies are high. Therefore, moderate adverse effects for Trowbridge are likely across all scenarios. However, adoption of proposed recommendations, including the adoption of the Trowbridge Bat Mitigation Strategy, could mitigate significant adverse effects.
- Strategies that propose higher levels of growth at Bradford on Avon (TR-A and TR-B) are considered likely to have significant adverse effects which would be difficult to mitigate, as are all strategies for Warminster and Trowbridge. It is recommended that levels of growth are reduced at these three settlements (Bradford on Avon, Trowbridge and Warminster) with growth focussed instead on Westbury and other settlements within the Rest of the HMA. **It is recommended that levels of growth are reduced at these three settlements with growth focussed instead on Westbury and other settlements within the Rest of the HMA and that this could be considered as a new strategy that would reduce significant effects against this objective**
- Westbury is considered the least constrained of the four settlements in terms of biodiversity and for this reason is considered better able to accommodate a higher level of growth.
- Development across the board should avoid areas of biodiversity sensitivity where possible, particularly important bat habitats such as woodland. Offsetting and habitat creation are likely to be key to enabling any further development where growth poses a risk to bat habitats, particularly in Trowbridge and Bradford on Avon. The adoption of an up-to-date Trowbridge Bat Management Strategy will help to ensure that additional development in the settlement prevents adverse effects. Development should also take the opportunity to improve habitats for bats where necessary, through the creation of woodland blocks and planting of hedgerows and tree lines which would improve habitat connectivity and buffer the effects of increased development.

- With regards to impacts on the River Avon SAC, particularly an issue in Warminster, a Memorandum of Understanding with relevant authorities has been agreed to ensure that development does not have negative effects upon the SAC. Ensuring the MoU remains up to date will be important to protecting the biodiversity in the SAC.
- Recreation impacts on the Salisbury Plain could be avoided by adopting an up-to-date Salisbury Plain Mitigation Strategy.

Sustainability Appraisal Objective 2: Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings

Decision-Aiding Question (DAQ) 1: Ensure efficient use of land?

The design of specific developments will involve setting appropriate housing densities for development which will be part of the planning process. The assessment of efficient use of land will be carried out in a more detailed way at the individual site assessment stage within the SA.

DAQ 2: Lead to the reuse of Previously Developed Land where possible/appropriate?

There is a lack of previously developed land (PDL) across the HMA. Therefore, all strategies are likely to result in the loss of greenfield land.

DAQ 3: Encourage remediation of contaminated land? If so, would this lead to issues of viability and deliverability?

Across Wiltshire, some 14000 sites of potential contamination exist as a result of a range of historical land uses; 225 high priority sites have been identified as part of a prioritised approach to inspection.

Currently four sites have been determined as contaminated land and remediated. The remediation of contaminated land will be principally addressed through the planning process where former sites change their use.

DAQ 4: Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)?

While there is some Grade 2 (very good) land to the north of **Bradford on Avon**, the majority of agricultural land surrounding the urban area is Grade 3 (good to moderate), with some Grade 4 (poor) land to the west.

In **Trowbridge**, the majority of agricultural land bordering the urban area is Grade 3 with some Grade 4 and a small area of Grade 2 in the north east.

While there are areas of Grade 4 and Grade 3 land surrounding **Westbury**, the south and south east of the town is surrounded by Grade 2 land.

The urban area of **Warminster** is surrounded by Grade 2 agricultural land to the east and west, although there are some areas of Grade 3 to the north and south and a small amount of Grade 4 to the south.

Excluding the urban areas, the majority of the Rest of the **HMA** is classified as being Grade 3 agricultural land, with large patches of Grade 4 land occurring in the centre of the HMA. However, the south of the HMA around Warminster and the south of Westbury has large areas of Grade 2 land.

DAQ 5: Lead to the sterilisation of viable mineral resources? If so, is there potential to extract the mineral resource as part of the development?

The majority of Bradford on Avon lies within a Mineral Safeguarding Area (MSA).

The east of Westbury lies within a Mineral Safeguarding Area.			
In the Rest of the HMA there are MSAs, particularly around Bradford on Avon and the east of Westbury.			
Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Further assessment is needed on any potential impacts associated with the MSA and Mineral Resource Block at Bradford on Avon, as well as the proportion of Grade 2 land and Grade 3a land within Grade 3 to understand the potential loss of BMV agricultural land. As this strategy proposes the highest amount of comparative housing and employment in Bradford on Avon, the risk of loss of BMV and minerals safeguarded land in the settlement is greater than for the other strategies. It is considered that minor adverse effects are likely against this objective. Bradford on Avon has a very low amount of PDL therefore the loss of greenfield land is likely.	This strategy proposes the same level of growth as TR-A but with no employment land. Further assessment is needed on any potential impacts associated with the MSA and Mineral Resource Block at Bradford on Avon, as well as the proportion of Grade 2 land and Grade 3a land within Grade 3 to understand the potential loss of BMV agricultural land. The risk of loss of BMV and minerals safeguarded land in the settlement is comparable to strategy TR-A. It is considered that minor adverse effects are likely against this objective. Bradford on Avon has a very low amount of PDL therefore the loss of greenfield land is likely.	While further assessment is needed on any potential impacts associated with the MSA and Mineral Resource Block at Bradford on Avon, as well as the proportion of Grade 2 land and Grade 3a land within Grade 3 to understand the potential loss of BMV agricultural land, it is considered likely that significant loss of BMV land and impacts on the mineral resources could be avoided as this strategy proposes a lower level of housing growth proportional to the settlement. However, Bradford on Avon has a very low capacity of PDL therefore the loss of greenfield land is likely. As a result, a minor adverse effect is considered likely.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Trowbridge	Further assessment is needed on the proportion of Grade 3a land within Grade 3 at Trowbridge to understand the potential loss of the best and most versatile (BMV) agricultural land as well as any potential impacts associated with the MSA. It is considered likely that development could avoid some of the BMV land and significant impacts on the MSA due to proposing a lower level of growth proportional to the settlement. However, despite the lower level of growth through this option, the proposed significant amount of housing at Trowbridge is likely to result in significant loss of greenfield land. As a result, moderate adverse effects on this objective are considered likely.	Whilst this strategy proposes the lowest growth further assessment is needed on the proportion of Grade 3a land within Grade 3 at Trowbridge to understand the potential loss of the best and most versatile (BMV) agricultural land as well as any potential impacts associated with the MSA. It is considered likely that development could avoid some of the BMV land and significant impacts on the MSA due to proposing a lower level of growth proportional to the settlement. However, despite the lower level of growth through this option, the proposed significant amount of housing at Trowbridge is likely to result in significant loss of greenfield land. As a result, moderate adverse effects on this objective are considered likely.	Further assessment is needed on the proportion of Grade 3a land within Grade 3 at Trowbridge to understand the potential loss of the best and most versatile (BMV) agricultural land as well as any potential impacts associated with the MSA. It is considered likely that development could avoid some of the BMV land and significant impacts on the MSA due to proposing a lower level of growth proportional to the settlement. However, despite the lower level of growth through this option, the proposed significant amount of housing at Trowbridge is likely to result in significant loss of greenfield land. As a result, moderate adverse effects on this objective are considered likely.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	This strategy proposes a lower level of growth proportional to Warminster. Further assessment is needed on any potential impacts associated with the MSA at Warminster, as well as the proportion of	This strategy proposes a lower level of growth proportional to Warminster. Further assessment is needed on any potential impacts associated with the MSA at Warminster, as well as the proportion of Grade 3a land within Grade 3	This strategy proposes a lower level of growth proportional to Warminster. Further assessment is needed on any potential impacts associated with the MSA at Warminster, as well as the proportion of Grade 3a land within Grade 3

	Grade 3a land within Grade 3 to understand the potential loss of BMV agricultural land. Warminster has a very low capacity of PDL so the significant loss of greenfield land is likely. Overall, moderate adverse effects are considered likely for all strategies at Warminster as the quantum of growth is similar.	to understand the potential loss of BMV agricultural land. Warminster has a very low capacity of PDL so the significant loss of greenfield land is likely. Overall, moderate adverse effects are considered likely for all strategies at Warminster as the quantum of growth is similar.	to understand the potential loss of BMV agricultural land. Warminster has a very low capacity of PDL so the significant loss of greenfield land is likely. Overall, moderate adverse effects are considered likely for all strategies at Warminster as the quantum of growth is similar.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Westbury	This strategy proposes a moderate level of growth proportional to Westbury. As a result, while further assessment is needed on any potential impacts associated with the MSA at Westbury, as well as the proportion of Grade 3a land within Grade 3 to understand the potential loss of BMV agricultural land, there is a risk that minor adverse effects can occur as Westbury has a very low capacity of PDL so the loss of greenfield land is likely. Furthermore, this strategy proposes the lower level of comparative growth at Westbury so the risk of minor adverse effects occurring is lowest compared to the other strategies.	This strategy proposes the highest level of growth of the three strategies. As a result, while further assessment is needed on any potential impacts associated with the MSA at Westbury, as well as the proportion of Grade 3a land within Grade 3 to understand the potential loss of BMV agricultural land, there is a risk that moderate adverse effects can occur as Westbury has a very low capacity of PDL so the loss of greenfield land is likely. Furthermore, this strategy proposes the highest level of comparative growth at Westbury so the risk of adverse effects occurring is higher compared to the other strategies.	This strategy proposes a moderate level of growth proportional to Westbury. As a result, while further assessment is needed on any potential impacts associated with the MSA at Westbury, as well as the proportion of Grade 3a land within Grade 3 to understand the potential loss of BMV agricultural land, there is a risk that minor adverse effects can occur as Westbury has a very low capacity of PDL so the loss of greenfield land is likely. Furthermore, this strategy proposes the lower level of comparative growth at Westbury so the risk of minor adverse effects occurring is lowest compared to the other strategies.
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	Due to the broad area in the Rest of the HMA, it is possible for development to avoid areas of BMV and minerals safeguarded land. The majority of the Rest of the HMA is classified as Grade 3 BMV land, further assessment would be needed to distinguish the areas of Grade 3a and Grade 3b to understand the extent of BMV land. Regardless, due to the likely loss of greenfield land, minor adverse effects are likely.	Due to the broad area in the Rest of the HMA, it is possible for development to avoid areas of BMV and minerals safeguarded land. As the majority of the Rest of the HMA is classified as Grade 3 land, further assessment would be needed to distinguish the areas of Grade 3a and Grade 3b to understand the extent of BMV land. Regardless, due to the likely loss of greenfield land, minor adverse effects are likely. This strategy proposes an intermediate level of growth to rolling forward the current strategy and therefore a more significant effect would be likely.	Due to the broad area in the Rest of the HMA, it is possible for development to avoid areas of BMV and minerals safeguarded land. However, as the majority of the Rest of the HMA is classified as Grade 3 land, further assessment would be needed to distinguish the areas of Grade 3a and Grade 3b to understand the extent of BMV land. This option proposes a significantly higher level of growth than TR-A and TR-B and as a result, this strategy is likely to have moderate adverse effects.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Overall HMA score	-1.4 At this stage no sites have been allocated which makes it difficult to advise how a particular development strategy will affect this objective. While there may be developable areas in each settlement which are able to avoid BMV land, overall, there is	-1.6 At this stage no sites have been allocated which makes it difficult to advise how a particular development strategy will affect this objective. While there may be developable areas in each settlement which are able to avoid BMV land, overall, there are likely to be moderate	-1.6 At this stage no sites have been allocated which makes it difficult to advise how a particular development strategy will affect this objective. While there may be developable areas in each settlement which are able to avoid BMV land, overall, there are likely to be moderate

	likely to be a minor adverse effect on SA objective 2 due to the loss of greenfield land.	adverse effects on SA objective 2 due to the loss of greenfield land.	adverse effects on SA objective 2 due to the loss of greenfield land.
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Conclusions/Recommendations:

- **Strategy TR-A is considered likely to have less adverse effects across the range of settlements/areas and is the most sustainable strategy.** However, moderate adverse effects are still anticipated at Trowbridge and Warminster.
- **Strategies TR-B and TR-C score equally and are considered less sustainable strategies** than TR-A against this objective as there are likely to be greater adverse effects (significant effects) against this objective.
- It is considered that all strategies for Trowbridge and Warminster are likely to have significant adverse effects against this objective as a significantly higher quantum of growth is directed to each settlement and it is likely that much of this will need to take place on greenfield sites on the edge of the towns, given the relative lack of PDL opportunities. In particular, Warminster has a high proportion of known BMV land (Grade 1 and Grade 2) surrounding the settlement, Westbury has a large amount of known BMV land to the south as well as Mineral Safeguarding Areas (MSAs) to the east, and Bradford on Avon lies within an MSA.
- There is a lack of previously developed land (PDL) across the HMA. Therefore, all strategies are likely to result in the loss of greenfield land and will potentially lead to the loss of the best and most versatile (BMV) agricultural land (Grade 1, 2 and 3a). However, without knowing the exact location of growth and the extent of what BMV land is required, it is anticipated that adverse impacts will occur in all strategies.
- The majority of the HMA is Grade 3 land. Therefore, in order to identify which areas are more suitable for development and less likely to lead to adverse effects, further assessment is likely to be needed to distinguish between Grade 3a land and Grade 3b land to determine the extent of BMV agricultural land.
- Uncertainties also exist regarding the potential for adverse impacts on mineral resources and the potential for contaminating remediating land.
- When allocating sites, areas of BMV agricultural land should be avoided where possible and PDL should be prioritised. Development should also encourage the remediation of contaminated land where feasible.
- Further assessment will also need to be carried out to understand the potential impacts of development on Mineral Safeguarding Areas (MSAs) when allocating precise locations for growth.

Sustainability Appraisal Objective 3: Use and manage water resources in a sustainable manner.

Decision-Aiding Question (DAQ) 1: Protect surface, ground and drinking water quality?

Trowbridge does not have any Source Protection Zones which would be affected by development, however, there is a Drinking Water Protected Area (Surface Area) surrounding the north of the town.

Bradford on Avon and the surrounding area lies within a Drinking Water Protected Area (Surface Water), and a Groundwater Source Protection Zone 2 (Outer Protection Zone) lies less than half a mile to the north of the settlement.

Any development which takes place to the south of **Westbury** would have to be cognisant of groundwater pollution as there are Source Protection Zones 1 and 2 (Inner and Outer Protection Zones) in the vicinity.

Source Protection Zones cover the north of **Warminster**, being mainly Zone 2 (Outer Protection) or Zone 3 (Total Catchment) with some smaller areas of Zone 1 (Inner Protection Zone).

While there are rural areas in the **Rest of the HMA** which are within Source Protection Zones or Drinking Water Protected Areas, there are also plenty of areas in the countryside where development could occur without posing a risk to water resources.

DAQ 2: Direct development to sites where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?

While Wessex Water have stated that infrastructure investment in **Trowbridge** is committed for 2019/20 with regards to phosphate reduction and additional capacity, at the time there are no plans for further investment. There is a moderate probability that rolling forward the current strategy would require construction works.

Bradford on Avon does not have any infrastructure investment scheduled, although Wessex Water have advised that assets are predicted to require investment to improve capacity between 2025 – 2036. There is a moderate probability that rolling forward the current strategy would require construction works.

Wessex Water have stated that infrastructure investment in **Westbury** is committed in 2019/20 and that further investment is likely to be required to improve capacity between 2025 – 2036. There is no probability that rolling forward the current strategy would require construction works to accommodate development.

In **Warminster**, Wessex Water have stated that investment is committed for 2020/21 and that further investment is likely to be required to improve capacity between 2025 and 2036. There is a moderate probability that rolling forward the core strategy would require construction works to accommodate development.

Rural development in the **Rest of the HMA** is likely to be more dispersed which may mean that the existing drainage infrastructure can handle the additional capacity. However, there may be a cumulative effect on the rural system. Furthermore, if the rural development is not dispersed it could lead to requirements to upgrade capacity outside of the main settlements which has not yet been accounted for.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	This strategy proposes a higher level of proportional housing growth for Bradford on Avon. However, Bradford on Avon is not within any SPZ. Minor adverse effects are considered likely given the additional demands placed on water, sewerage and drainage infrastructure.	This strategy proposes a higher level of proportional housing growth for Bradford on Avon. However, Bradford on Avon is not within any SPZ. Minor adverse effects are considered likely given the additional demands placed on water, sewerage and drainage infrastructure.	This strategy proposes a lower level of proportional housing growth for Bradford on Avon. Bradford on Avon is not within any SPZ. Minor adverse effects are considered likely given the additional demands placed on water, sewerage and drainage infrastructure.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Trowbridge	This strategy proposes the highest level of growth at Trowbridge and is therefore likely to lead to significant pressures on the local water network and effects on areas of protection, unless investment is made into enhancing the local network. It is likely that there	Despite this strategy proposing the lowest level of growth proportional to Trowbridge, development would likely lead to similar impacts as both strategies TR-A and TR-C. As such, it is likely that there would be a moderate adverse	As this strategy proposes an intermediate level of housing growth proportional to Trowbridge, therefore, like strategies TR-A and TR-B is likely to lead to significant pressures on the local water network and effects on areas of protection, unless investment is made into enhancing the local

	would be a moderate adverse effect as a result of this strategy. Furthermore, this strategy proposes the highest level of comparative housing growth and is therefore likely to have more significant effects compared to the other strategies. However, mitigation is achievable, if problematic.	effect as a result of this strategy. However, mitigation is achievable, if problematic.	network. It is likely that there would be a moderate adverse effect as a result of this strategy. However, mitigation is achievable, if problematic.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	All three strategies propose a similar level of significant growth at Warminster with effects against this objective likely to be similar. The town is subject to a large number of water resource protections. However, investment is committed to be undertaken to increase the capacity of the local water network. It is likely that there would be moderate adverse effects against this objective.	All three strategies propose a similar level of significant growth at Warminster with effects against this objective likely to be similar. The town is subject to a large number of water resource protections. However, investment is committed to be undertaken to increase the capacity of the local water network. It is likely that there would be moderate adverse effects against this objective.	All three strategies propose a similar level of significant growth at Warminster with effects against this objective likely to be similar. The town is subject to a large number of water resource protections. However, investment is committed to be undertaken to increase the capacity of the local water network. It is likely that there would be moderate adverse effects against this objective.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Westbury	This strategy proposes a lower level of proportional housing growth for Westbury. There is a risk to the SPZ to the south and a need for future investment to increase the capacity of the water network and manage any effects on water protection areas. It is likely that this level of development will have minor adverse effects against this objective.	This strategy proposes a significant level of growth proportional to Westbury which is the highest level of comparative housing growth. Therefore, there is increased risk to the SPZ and a need for future investment to increase the capacity of the water network and manage any effects on water protection areas. This level of development likely to have moderate adverse effects against this objective.	This strategy proposes a lower level of proportional housing growth for Westbury. There is a risk to the SPZ to the south and a need for future investment to increase the capacity of the water network and manage any effects on water protection areas. It is likely that this level of development will have minor adverse effects against this objective.
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	There are areas in the countryside where development could occur without posing a risk to water resources. However, it could lead to requirements to upgrade capacity outside of the main settlements which has not yet been accounted for. Due to the potential impact on the rural drainage system and water protection zones, a minor adverse effect in the Rest of the HMA is considered likely.	There are areas in the countryside where development could occur without posing a risk to water resources. However, it could lead to requirements to upgrade capacity outside of the main settlements which has not yet been accounted for. Due to the potential impact on the rural drainage system and water protection zones, a minor adverse effect in the Rest of the HMA is considered likely.	There are areas in the countryside where development could occur without posing a risk to water resources. However, it could lead to requirements to upgrade capacity outside of the main settlements which has not yet been accounted for. Due to the potential impact on the rural drainage system and water protection zones, a minor adverse effect in the Rest of the HMA is considered likely.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Overall HMA score	-1.4 Due to uncertainties regarding the precise location of development and the potential for additional investment in infrastructure, it is difficult to assess the potential impact on water resources. As a result, due to the presence of Drinking Water	-1.6 Due to uncertainties regarding the precise location of development and the potential for additional investment in infrastructure, it is difficult to assess the potential impact on water resources. With significant effects considered likely	-1.4 Due to uncertainties regarding the precise location of development and the potential for additional investment in infrastructure, it is difficult to assess the potential impact on water resources. As a result, due to the presence of Drinking Water Safeguard Areas and Source Protection

	Safeguard Areas and Source Protection Zones and the potential for additional pressure on the water network, minor adverse effects on SA objective 3 are considered likely.	at Trowbridge, Warminster and Westbury, moderate adverse effects on SA objective 3 are considered likely.	Zones and the potential for additional pressure on the water network, minor adverse effects on SA objective 3 are considered likely.
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Conclusions/Recommendations:

- Although the three strategies score similarly, strategies **TR-A and TR-C are more sustainable as there are less adverse effects likely.**
- **Strategy TR-B is considered the least sustainable strategy** as it is likely to have greater adverse effects than SW-A and SW-C
- There are areas in the HMA which lie within Source Protection Zones and Drinking Water Safeguard Areas which would need to be considered if development was allocated in that area. Furthermore, additional development beyond what is already planned for may require further investment in infrastructure, although until sites have been allocated it is difficult to know whether capacity issues will already have been addressed by planned improvements or whether further works will be required.
- Given the scale of proposed growth at Trowbridge and Warminster, all strategies are considered likely to have moderate adverse effects which would be difficult to mitigate. However, mitigation is achievable, and the sustainability of any development will very much depend on its type and location, as well as any water efficiency measures installed.
- Warminster is the only settlement in the Trowbridge HMA where a Source Protection Zone (Zones 2 and 3) impinges on the built-up area itself. The Source Protection Zone also covers the entire north of the settlement and a Zone 3 designation surrounds Warminster to the east and west. Therefore, development in the settlement could struggle to avoid building in a protection zone. Similarly, Bradford on Avon and the surrounding area lies within a Drinking Water Protected Area (Surface Water). However, although development should be aware of the requirement to protect groundwater and drinking water, it is unlikely to majorly affect housing development. Furthermore, while Warminster and Bradford on Avon would be considered the most constrained with regards to this objective, the amount of housing proposed at the settlements is at a low level proportional to the towns in each strategy.
- With regards to investment in infrastructure, development in the rural area is most likely to require additional investment as Wessex Water's planned improvement works are focused on the towns. Westbury has been identified as a settlement that would be unlikely to require construction works at the settlement to accommodate development. As a result, development in the Rest of the HMA poses a risk ensuring capacity of the water network.
- Due to the uncertainties regarding the impact on groundwater protection zones and the water network, likely adverse effects are considered likely across all settlements. However, as Strategy TR-B proposes the joint highest amount of comparative housing growth in Bradford on Avon and the highest amount of comparative housing growth in Warminster which are considered the most constrained with regards to groundwater and drinking water resources, Strategy TR-B is ranked as the least preferred strategy. While Strategy TR-C proposes the lowest amount of growth in the most constrained settlements of Bradford on Avon and Warminster, it also proposes the highest amount of comparative housing growth in the Rest of the HMA which may lead to issues with the rural water network. As a result, Strategy TR-C is ranked equally with Strategy TR-A which, despite proposing the joint highest amount of housing growth in Bradford on Avon, also proposes the lowest amount of growth in Warminster and the Rest of the HMA, which are locations considered to be at risk with relation to Objective 3.
- With regards to investment in infrastructure, development in the rural area is most likely to require additional investment as Wessex Water's planned improvement works are focused on the towns. As a result, development in the Rest of the HMA poses a risk to ensuring capacity of the water network and will need further assessment to ensure capacity of the water network.
- To improve sustainability performance against this objective, development should avoid polluting groundwater and protect surface, ground and drinking water quality. It should be located in areas which have adequate water infrastructure and take account of the EA's approach to groundwater protection. Incorporation of SuDS will be important and the need for water can be

reduced through water sensitive design, such as integrated water cycle management. Development should avoid polluting groundwater protection zones and protect surface, ground and drinking water quality.

Sustainability Appraisal Objective 4: Improve air quality and minimise all sources of environmental pollution

Decision-Aiding Question (DAQ) 1: Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration?

At this high-level stage of appraisal, it is difficult to make notable distinctions between the options with relation to noise, light pollution, odour and vibration. Although, any level of development is expected to have a degree of effect, it is assumed that these matters would not necessarily be affected by the strategic distribution of housing and therefore no conclusions on this aspect of the strategic objective have been made at this stage.

Despite this, there is a risk that across the HMA and particularly within the Rest of the HMA, allocated growth may place development in locations where increases in pollutants such as noise and light may occur where this is not currently an issue.

DAQ 2: Minimise effects on and where possible improve air quality and locate sensitive development away from areas of poor air quality (such as AQMAs)?

Bradford on Avon has a long standing AQMA for annual average exceedance of nitrogen dioxide and small particulates (PM₁₀) with no improvement in the former. The data for fine particulate monitoring supports revocation of the AQMA in this respect. Bath Clean Air Zone may cause the displacement of traffic onto Wiltshire roads, but monitoring of potential traffic displacement onto Wiltshire Roads from Bath CAZ is agreed with Bath.

Westbury has a long standing AQMA. Historic real-time monitoring for NO₂, PM₁₀ and SO₂ and indicative real-time monitoring for particulates commenced in 2018. Other pollutants from nearby waste treatment works are present. Bath Clean Air Zone may cause the displacement of traffic onto Wiltshire roads, but monitoring of potential traffic displacement onto Wiltshire Roads from Bath CAZ is agreed with Bath.

Trowbridge is not subject to any AQMA declarations, two diffusion tubes to monitor were introduced in 2019 and the settlement is not considered at risk of a AQMA declaration.

Warminster is not subject to any AQMA declarations. A diffusion tube is apparent in Warminster and an additional tube is apparent in Heytesbury. The settlement is not considered at risk of an AQMA declaration.

Development in the **Rest of HMA** is unlikely to have a major effect on any existing AQMA. Due to the dispersed nature of facilities and the lack of public transport provision in these areas, development may lead to an increased number of journeys in the private car which could lead to increased pollutants from vehicles.

DAQ 3: Lie within a consultation risk zone for a major hazard site or hazardous installation?

Consultation risk zones have not been considered for this high-level stage of appraisal. It is assumed that these matters would not necessarily be affected by the strategic distribution of housing and so no conclusions on this aspect of the strategic objective have been made at this stage but are expected to be covered at lower level stages.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Comparatively, this strategy directs more development to Bradford on Avon than the other	Comparatively, this strategy directs more development to Bradford on Avon, the same as TR-A except no requirement for employment land.	This strategy proposes the lowest level of growth for Bradford on Avon.

	<p>strategies, although this figure is low in proportionate and relative terms. All new development is likely to have some impacts re noise and light pollution. This level of growth is assessed as having a moderate adverse effect against this objective within Bradford on Avon due to the occurrence of a declared AQMA.</p>	<p>All new development is likely to have some impacts re noise and light pollution. Although this figure is low in proportionate and relative terms, this level of growth is assessed as having a moderate adverse effect against this objective within Bradford on Avon due to the occurrence of a declared AQMA.</p>	<p>All new development is likely to have some impacts re noise and light pollution. This figure is very low in proportionate and relative terms and is likely to have minor adverse effects against this objective.</p>
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Trowbridge	<p>Trowbridge is lower risk with regards to air quality and is not highlighted as a location of immediate air quality concern. However, for all strategies at Trowbridge, proposed levels of growth are significant, and a range of environmental pollutants are likely to be increased. All new development is likely to have some impacts re noise and light pollution. Growth of this scale at Trowbridge is likely to have some adverse effects in terms of environmental pollution and this is likely to be moderate adverse with mitigation considered to be problematic. Effects of this strategy are likely to be greater than TR-B and TR-C.</p>	<p>Trowbridge is lower risk with regards to air quality and is not highlighted as a location of immediate air quality concern. However, for all strategies at Trowbridge, proposed levels of growth are significant, and a range of environmental pollutants are likely to be increased. All new development is likely to have some impacts re noise and light pollution. Growth of this scale at Trowbridge is likely to have some adverse effects in terms of environmental pollution and this is likely to be moderate adverse with mitigation considered to be problematic. Effects of this strategy are likely to be less than TR-A and TR-C</p>	<p>Trowbridge is lower risk with regards to air quality and is not highlighted as a location of immediate air quality concern. However, for all strategies at Trowbridge, proposed levels of growth are significant, and a range of environmental pollutants are likely to be increased. All new development is likely to have some impacts re noise and light pollution. Growth of this scale at Trowbridge is likely to have some adverse effects in terms of environmental pollution and this is likely to be moderate adverse with mitigation considered to be problematic. Effects of this strategy are likely to be greater than TR-B but less than TR-A.</p>
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	<p>Warminster is lower risk with regards to air quality and is not highlighted as a location of immediate air quality concern. Proposed levels of growth are low in relative terms. Growth of this scale at Warminster is likely to have some adverse effects in terms of environmental pollution and this is likely to be minor adverse with mitigation considered to be achievable. Effects of this strategy are likely to be similar to TR-C.</p>	<p>Warminster is lower risk with regards to air quality and is not highlighted as a location of immediate air quality concern. Proposed levels of growth are highest for this particular strategy in relative terms. Growth of this scale at Warminster is likely to have some adverse effects in terms of environmental pollution and this is likely to be minor adverse with mitigation considered to be achievable. Effects of this strategy are likely to be greater than TR-A and TR-C.</p>	<p>Proposed levels of growth are low in relative terms. Growth of this scale at Warminster is likely to have some adverse effects in terms of environmental pollution and this is likely to be minor adverse with mitigation considered to be achievable. Effects of this strategy are likely to be similar to TR-A.</p>
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Westbury	<p>Development of any sort is likely to have adverse impacts in an area with a designated AQMA and monitoring for NO², PM¹⁰ and SO². The level of growth in this strategy is likely to have a range of adverse effects on environmental pollution, including air quality, noise and light pollution.</p>	<p>Development of any sort is likely to have adverse impacts in an area with a designated AQMA and monitoring for NO², PM¹⁰ and SO². This strategy proposes higher levels of growth for Westbury. This is higher than rolling forward the current strategy through option TR-A. The extent of mitigation measures required to minimise effects on air quality and other pollutants is unclear for this scale of growth.</p>	<p>Development of any sort is likely to have adverse impacts in an area with a designated AQMA and monitoring for NO², PM¹⁰ and SO². The level of growth in this strategy is likely to have a range of adverse effects on environmental pollution, including air quality, noise and light pollution. Likely effects are considered to be moderate adverse as there is currently an AQMA in place.</p>

	Likely effects are considered to be moderate adverse.	This strategy could significantly increase impacts without adequate infrastructure and mitigation. Likely effects are considered to be moderate adverse.	Likely effects are considered to be moderate adverse.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Rest of HMA	The level of development proposed in the rest of the HMA is more likely to place development away from many of the county's existing AQMAs and therefore is less likely to have significant adverse effects. Due to the dispersed nature of facilities and the lack of public transport provision in certain areas of the rest of the HMA, development may lead to a proportionately increased number of private car journeys which could lead to increased pollutants from vehicles. This scale of growth is likely to have some other adverse effects in terms of environmental pollution such as noise and light pollution from new development. This is assessed as having a minor adverse effect against this objective.	There is a relatively low, but comparatively high level of growth proposed in Rest of HMA by this strategy. The level of development proposed in the rest of the HMA is more likely to place development away from many of the county's existing AQMA and therefore is less likely to have a moderate adverse impact upon any existing AQMA. Due to the dispersed nature of facilities and the lack of public transport provision in certain areas in rest of HMA, development may lead to a proportionately increased number of journeys in the private car which could lead to increased pollutants from vehicles. This level of growth in these locations is assessed as having a minor adverse effect against this objective.	This strategy proposes a low level of growth in relative terms, but this is high in comparative terms. The level of development proposed in the Rest of the HMA is more likely to place development away from many of the county's existing AQMA and therefore is less likely to have a moderate adverse impact upon any existing AQMA. Due to the dispersed nature of facilities and the lack of public transport provision in certain areas in rest HMA, development may lead to a proportionately increased number of journeys in the private car which could lead to increased pollutants from vehicles. This level of growth in these locations is assessed as having a minor adverse effect against this objective.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Overall HMA score	-1.6 Overall, this development strategy is considered likely to have moderate adverse effects against this objective.	-1.6 Overall, this development strategy is considered likely to have moderate adverse effects against this objective.	-1.4 Overall, this development strategy is considered likely to have minor adverse effects against this objective.

Conclusions/Recommendations:

- All strategies are considered likely to have adverse effects overall against this SA objective, given the distribution of growth proposed. All strategies are considered likely to have significant adverse effects at Trowbridge and Westbury given proposed scales of growth and/or existing issues.
- **Strategy TR-C is considered more sustainable as there are less adverse effects likely.** This is primarily due to this strategy proposing lower levels of growth at Bradford on Avon which has longstanding air quality issues. Strategy TR-C is only marginally more sustainable than the other two strategies.
- **Strategies TR-A and TR-B score equally and are the joint least sustainable strategies as they are likely to have greater adverse effects.** This is primarily due to the significant level of growth proposed at Trowbridge, together with proposed levels of growth in Bradford on Avon and Westbury, where there are existing air quality issues.
- All development strategies lead to additional development and are therefore likely to lead to increased traffic in the identified settlements alongside the wider transport network and consequently increase levels of associated pollutants.
- Settlements of particular concern with relation to this objective are Bradford on Avon and Westbury. While lower levels of growth are proposed at Bradford on Avon across all three strategies, the town has been identified as facing air quality issues, including a long-term AQMA, and there is a risk that negative effects could result as a result of growth of any level.

Additionally, as Strategy TR-B proposes a higher amount of growth at Westbury. The extent of the effect on an existing AQMA is expected to be more significant than rolling forward the current strategy and the most as a result of this strategy.

- Trowbridge is lower risk with regards to air quality. However, for all strategies at Trowbridge, proposed levels of growth are significant and significant effects are considered likely where mitigation would be problematic.
- Warminster is lower risk with regards to air quality. Proposed levels of growth are low in relative terms. Growth of this scale at Warminster is likely to have some adverse effects in terms of environmental pollution and this is likely to be minor adverse with mitigation considered to be achievable.
- All strategies in the Rest of the HMA are considered likely to have minor adverse effects as development is more likely to be dispersed and locate development away from many of the county's existing AQMAs. However, due to the dispersed nature of facilities and the lack of public transport provision in many rural areas, development may lead to an increased number of private car journeys.
- When considering at risk areas, development should be accompanied with mitigation measures such as highway improvements that can alleviate/improve congestion and environmental pollutant issues present and subsequently improve air quality. It is recommended that development in all areas is associated with, where necessary, highway/public transport improvement measures to alleviate air quality concerns.
- Development led improvements in sustainable transport infrastructure that would otherwise be difficult to achieve may become viable with certain levels growth, both residential and employment. It is recommended that where development takes place improvements in sustainable transport options should be sought to alleviate air quality concerns.
- It is recommended that wherever development takes place, it is done so sympathetically with regards to air quality and pollution concerns. Improvement measures should be sought where possible to improve the situation in these areas and development should not occur at the detriment of air quality and pollution.
- As the areas of poor air quality in Wiltshire are all traffic related, new development should contribute to improved air quality through reducing the need to travel by private car, promoting policies that promote development of sustainable transport links, promote housing development in sustainable locations and increasing on site vegetation in order to provide carbon sinks.
- With regards to noise and light pollution, these are generally the result of urban development. Specific locational policies can ensure that development is directed to the most appropriate locations where air quality, noise and light pollution will be avoided or kept to a minimum.
- When planning new development, mitigation may be achieved by taking into account the Air Quality Strategy for Wiltshire which sets out vision for achieving objectives. Where there is an existing AQMA account should also be given to the Air Quality Management Plan. Developers will also need to play an active role in achieving air quality objectives while opportunities will also exist to use S106 agreements for site specific mitigation measures.

Sustainability Appraisal Objective 5: Minimise impacts on climate change (mitigation) and reduce vulnerability to future climate change effects (adaptation)

Decision-Aiding Question (DAQ) 1: Promote the development of renewable and low carbon sources of energy?

For appraisal at subsequent, more detailed / site-specific SA stages.

DAQ 2: Be located within flood zone 2? If so, are there alternative sites in the area that can be allocated in preference to developing land in flood zone 2? (To be determined through the application of the Sequential Test)

For appraisal at subsequent, more detailed / site-specific SA stages.

DAQ 3: Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere?

Fluvial flood-risk, along with surface and groundwater flooding form part of the settlement-level analysis below. The cumulative impact of development was also considered in order to identify those catchments where an increase in flows as a result of development would have the greatest impact on downstream flood risk. This analysis is based on a strategic assessment of flood risk. Local knowledge will be applied when specific development locations are identified. In terms of flood-risk potential at settlements the following can be stated:

Trowbridge is at low risk of river and groundwater flooding and at high risk of surface water flooding. The cumulative impact of development is assessed as low.

Westbury is at low risk of river flooding and at moderate risk of surface water and groundwater flooding. The cumulative impact of development is assessed as moderate.

Warminster is at moderate risk of river flooding and at high risk of surface water and groundwater flooding. The cumulative impact of development is assessed as moderate.

Bradford on Avon is at high risk of river and surface water flooding and at low risk of groundwater flooding. The cumulative impact of development is assessed as moderate.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Development at Bradford on Avon is potentially constrained by surface water flooding, as well as additional fluvial risk linked to the River Avon. All alternatives direct relatively low levels of development to Bradford. This level of growth is not expected to have significant impacts on flood risk. Consequently, minor adverse effects on this objective are considered likely.	Development at Bradford on Avon is potentially constrained by surface water flooding, as well as additional fluvial risk linked to the River Avon. All alternatives direct relatively low levels of development to Bradford. This level of growth is not expected to have significant impacts on flood risk. Consequently, minor adverse effects on this objective are considered likely.	Development at Bradford on Avon is potentially constrained by surface water flooding, as well as additional fluvial risk linked to the River Avon. All alternatives direct relatively low levels of development to Bradford. This level of growth is not expected to have significant impacts on flood risk. Consequently, minor adverse effects on this objective are considered likely.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Trowbridge	Trowbridge has some areas of flood risk, particularly from surface water. The quantum directed at Trowbridge under Core Strategy Continued is high, therefore moderate adverse effects are indicated.	Trowbridge has some areas of flood risk. Whilst the quantum directed at Trowbridge under this strategy is moderately high but lower than TR-A and TR-C, it is believed that proposed growth levels could be accommodated. Therefore, minor adverse effects are indicated.	Trowbridge under this development scenario would receive a reduced quantum of growth, less than but similar to Core Strategy Continued. Whilst some areas of the town are susceptible to flooding, minor adverse effects are indicated for this settlement.
	Likely effects: moderate adverse	Likely effects: minor adverse	Likely effects: minor adverse
Warminster	Warminster is at moderate risk of river flooding and at high risk of surface water and groundwater flooding. Whilst the quantum directed at Warminster under Core Strategy Continued is moderately low it is believed that proposed growth levels could be accommodated. Moderate adverse effects are considered likely.	All strategies propose similar levels of development at Warminster. Warminster is at moderate risk of river flooding and at high risk of surface water and groundwater flooding. Growth proposed in this strategy is higher than the other two strategies and this may result in moderate adverse effects.	This strategy proposes very similar growth to TR-A and therefore similar impacts are expected. Moderate adverse effects are considered likely.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse

Westbury	Westbury is at low risk of river flooding and at moderate risk of surface water and groundwater flooding. Whilst the quantum directed at Westbury under Core Strategy Continued is moderately low, comparatively, it is believed that proposed growth levels could be accommodated. Therefore, minor adverse effects are indicated.	This development strategy directs substantially greater growth to the town compared to the others, including Core Strategy Continued - and this is assessed as likely to have moderate adverse effects here. Westbury is at low risk of river flooding and at moderate risk of surface water and groundwater flooding. Moderate adverse effects considered likely overall.	This strategy proposes very similar growth to TR-A and therefore similar impacts are expected. The quantum directed at Westbury is moderately low therefore it is believed that proposed growth levels could be accommodated. Therefore, minor adverse effects are indicated.
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	Development quanta for Rest of HMA, whilst not location-specific, are moderately high and therefore estimated to lead to minor adverse effects, which will be clarified as site-level proposals emerge.	Development quanta for Rest of HMA, whilst not location-specific, are moderately high and therefore estimated to lead to minor adverse effects, which will be clarified as site-level proposals emerge.	TR-C has the greatest level of development directed to Rest of HMA – considerably higher than Core Strategy Continued. Due to this higher level of growth, the strategy has been assessed as having moderate adverse effects until more is known on a local level. Any proposed locations for development could present a higher potential for flooding.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Overall HMA score	-1.4 Overall the strategy is likely to have minor adverse effects as regards objective 5.	-1.4 Overall this strategy is deemed to have likely minor adverse effects on objective 5. However, significant effects are likely at Warminster and Westbury.	-1.4 Overall this strategy is likely to have minor adverse effects on objective 5. However, significant effects are likely in the Rest of the HMA.

Conclusions and Recommendations:

- All strategies are considered likely to have minor adverse effects overall against this SA objective, given the distribution of growth proposed.
- Whilst all areas within Trowbridge HMA demonstrate some areas at risk of flooding, some places are more constrained than others. Warminster has the greatest potential for adverse impacts under this objective owing to high levels of surface and groundwater flood-risk. However, proposed growth levels here are not excessive and TR-A and TR-C are likely to have minor adverse effects overall. The higher quantum under TR-B suggests greater risks at this settlement, and therefore the prospects are for likely moderate adverse effects.
- Trowbridge and Westbury are likely to offer the best opportunities for flood resilience. However, the strategy that propose increased growth quanta at Westbury (TR-B), moderate adverse effects are considered likely.
- Given the low quantum proposed at Bradford on Avon, minor adverse effects are considered likely.
- In the Rest of the HMA, Strategy TR-C proposes the greatest level of development – considerably higher than the other two strategies. Due to this higher level of growth, the strategy has been assessed as having likely moderate adverse effects until more is known on a local level. Any proposed locations for development could present a higher potential for flooding.
- In terms of the main settlements in Trowbridge HMA, the headline recommendations as regards flood resilience are:
 - Trowbridge:** Due to surface water flood risk, stringent policy with regards to the control of surface water discharges from new development would be required.

Westbury: Due to surface water flood risk and cumulative impacts, stringent policy with regards to the control of surface water discharges from new development would be required. As high groundwater levels may impede infiltration-based sustainable drainage, site investigations would be needed to prove viability.

Bradford on Avon: Due to river and surface water flood risk and cumulative impacts, stringent policy with regards to the control of surface water discharges from new development would be required.

Warminster: Due to river and surface water flood risk and cumulative impacts, stringent policy with regards to the control of surface water discharges from new development would be required. It is recommended that development sites are not allocated in areas at high risk of groundwater flooding.

- In all instances, in order to provide climate change adaptation and mitigation and improve flood resilience, drainage solutions must incorporate green infrastructure and/or sustainable drainage systems. The Strategic Flood Risk Assessment informs as regards application of the sequential test and, if needed, the exception test.

Sustainability Appraisal Objective 6: Protect, maintain and enhance the historic environment

Decision-Aiding Question (DAQ) 1: Conserve and enhance World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas and Historic Parks & Gardens, sites of archaeological interest, undesignated heritage assets and their settings?

Whilst this level of analysis makes reference to designated and non-designated heritage assets, these will be appraised in more detail at site-specific stage. At a strategic level, key heritage assets in/around settlements are as follows:

Trowbridge: assets include the town centre and Newtown conservation areas, the historic cores of nearby villages in the surrounding areas, notably Southwick, North Bradley, Staverton, Hilperton [conservation area] and Semington. The Hilperton area has good preservation of medieval landscape character, and the Kennet & Avon Canal and associated WWII defence features are a valued asset.

Westbury: assets include the town centre conservation area, Bratton Camp scheduled monument and white horse and their settings; listed Heyward House and its setting; the scheduled moated site and setting at Penleigh; the land surrounding Leighton House; numerous Designated Farmsteads.

Warminster: assets include the town centre conservation area, prominent hill-forts at Cley Hill, Battlesbury and Scratchbury (west and north-east of the town) and Bishopstrow conservation area (south-east).

Bradford on Avon: assets include the town centre conservation area, registered parks and gardens at Belcombe Court and The Hall and their settings, plus conservation areas in nearby Turleigh, Winsley, Avoncliff and Lower Westwood (west and south-west). The Kennet & Avon Canal to the south is also a highly-valued asset.

DAQ 2: Maintain and enhance the character and distinctiveness of settlements through high quality and appropriate design, taking into account the management objectives of Conservation Areas?

Whilst this level of analysis makes some reference to historic landscape character and townscape quality, design and conservation areas will feature more strongly in subsequent, more detailed / site-specific, appraisal.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
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Bradford on Avon	In and around Bradford on Avon, accommodating this small amount of growth is possible. Bradford on Avon has a range of assets but this low amount of growth would be likely to have minor adverse effects overall.	In and around Bradford on Avon, accommodating this small amount of growth is possible. Bradford on Avon has a range of assets but this low amount of growth would be likely to have minor adverse effects overall.	Under this scenario proposed growth at Bradford on Avon is much lower compared to Core Strategy Continued. Bradford on Avon is comparatively more constrained under this objective than other settlements in the HMA; however, given the low level of growth proposed it is considered that minor adverse effects are likely.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Trowbridge	Under a continuation of the Wiltshire Core Strategy, designated and non-designated heritage assets in/around Trowbridge may be significantly affected by this high relative growth. Due to a lack of brownfield sites within the town to accommodate this growth, development of greenfield sites on the town edge may impact on neighbouring villages' heritage assets. At this spatial level of analysis this strategy would suggest likely moderate adverse effects upon designated and non-designated heritage assets and their settings. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.	This strategy proposes the least growth. It is possible that this strategy could be more easily accommodated without significant adverse effects, unlike the other two strategies, and therefore minor adverse effects are likely. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.	Designated and non-designated heritage assets in/around Trowbridge may be significantly affected by this high relative growth. Due to a lack of brownfield sites within the town to accommodate this growth, development of greenfield sites on the town edge may impact on neighbouring villages' heritage assets. At this spatial level of analysis this strategy would suggest likely moderate adverse effects upon designated and non-designated heritage assets and their settings. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.
	Likely effects: moderate adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Warminster	Warminster and its environs are characterised by the presence of conservation areas, listed buildings, registered parks & gardens, dispersed farmsteads and other scheduled assets. However, the quantum proposed in/around Warminster, similar under each strategy, appears to be unlikely to have significant effects on this objective. Minor adverse effects are thus considered likely. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.	Warminster and its environs are characterised by the presence of conservation areas, listed buildings, registered parks & gardens, dispersed farmsteads and other scheduled assets. However, the quantum proposed in/around Warminster, similar under each strategy, appears to be unlikely to have significant effects on this objective. Minor adverse effects are thus considered likely. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.	Warminster and its environs are characterised by the presence of conservation areas, listed buildings, registered parks & gardens, dispersed farmsteads and other scheduled assets. However, the quantum proposed in/around Warminster, similar under each strategy, appears to be unlikely to have significant effects on this objective. Minor adverse effects are thus considered likely. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Westbury	This strategy proposes the lowest growth. Westbury includes various assets such as Bratton Camp scheduled monument and white horse and their settings; listed Heyward House and setting; the scheduled moated site and setting at Penleigh; the land surrounding Leighton House; numerous Designated Farmsteads. Given that growth is	Strategy TR-B proposes the highest level of growth for Westbury that includes housing and employment land. The town has various heritage assets. Given the amount of development proposed it is considered that this would indicate moderate adverse effects on heritage assets at/around this locality.	The strategy proposes slightly higher growth than TR-A therefore it is likely that similar effects would occur. As such minor adverse impacts are likely.

	comparatively low and development locations are unknown, minor adverse effects are therefore likely.		
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	Under this strategy development rates in Rest of HMA are elevated. The nature of heritage assets distribution in the rural area means that such growth locations would have to be selected carefully. Overall, given the size of the rural area and therefore the ability for development to avoid harm to heritage assets, minor adverse effects are likely.	Under this strategy moderately high growth rates – greater than under Core Strategy Continued - mean that locations in Rest of HMA would have to be selected very carefully. However, this level of growth is considered unlikely to have significant effects on heritage assets. Minor adverse effects are therefore likely since such development localities are still unknown.	The nature of heritage assets distribution means that locations across Rest of HMA would have to be selected carefully as regards possible growth. Strategy TR-C raises growth quanta considerably in more rural areas. On this basis moderate adverse effects for Rest of HMA are likely at this strategic level of analysis, particularly since such development locations are still unknown.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Overall HMA score	-1.2 In light of the above the strategy as a whole therefore suggests minor adverse effects against Objective 6 with significant effects considered likely at Trowbridge.	-1.2 In light of the above the strategy as a whole therefore suggests minor adverse effects against Objective 6 with significant effects considered likely at Westbury.	-1.4 In light of the above the strategy as a whole therefore suggests minor adverse effects against Objective 6 with significant effects considered likely at Trowbridge and Rest of HMA.

Conclusions and Recommendations:

- Although all strategies were assessed as having likely minor adverse effects overall, **Strategies TR-A and TR-B score equally and are considered to be the more sustainable options** as there are less adverse effects likely.
- **Strategy TR-C is considered to be the less sustainable strategy** as it is likely to have greater adverse effects overall.
- The higher growth options for Trowbridge (TR-A and TR-C) are considered likely to have significant adverse effects overall where mitigation would be problematic.
- The higher growth options for Westbury and Rest of the HMA are considered likely to have significant adverse effects overall where mitigation would be problematic.
- None of the strategies for Bradford on Avon and Warminster are considered likely to have significant effects on this objective, given the relatively low level of growth proposed.
- It appears possible that the HMA can accommodate the proposed quantum overall for all strategies without likely significant effects. It may also be possible to direct additional growth to Bradford on Avon, Warminster, Westbury and the Rest of the HMA without leading to likely significant effects, but this will depend on the specific development locations.
- The nature of heritage assets is site-specific, and, as such, adverse effects remain unclear until development locations start to become finalised, and successive assessment able to demonstrate that impacts can be limited. This is especially pertinent to Trowbridge and environs, where the quantum of proposed development is generally rather high.
- Whilst it appears possible that the HMA can accommodate the proposed quantum overall, additional to the already high levels of existing commitments, there may be a rationale to exploring whether a percentage of Trowbridge's proposed growth could be assigned to Westbury.

- In order to reduce significant adverse effects at Trowbridge, localised areas of search may exist towards the north and north-east of the settlement, although there is a strong marker on conserving the integrity of the WWII GHQ 'Blue Line' relating to the Avon and the Kennet & Avon Canal. Small-scale growth may be locally feasible towards the south and east. However, in order to accommodate such a substantial quantum of development, to limit adverse impacts, any strategy would benefit from both assessing the green belt to the north and west of Trowbridge and maximising the ability of brownfield land in the town centre to deliver new housing and employment.
- In/around Bradford, in order to reduce significant adverse effects, small-scale development may be locally appropriate. The town nevertheless features a wide range of designated and non-designated heritage assets. Development-led increases on traffic flows would put pressure on assets within the historic core. It is possible that a strategy for accommodating proposed development might be a reappraisal of the green belt that surrounds the town
- As regards Westbury, there is probably scope for development in selected locations close to the town in an arc comprising the west around to the north-east. Other areas around the town appear to be more constrained in terms of heritage assets and their settings.
- In/around Warminster, in order to limit significant adverse effects, there could be localised scope for small-scale development inside the A36/A350. The town nevertheless features a wide range of designated and non-designated heritage assets both within and without the urban area and development would have to be planned very carefully.
- New development should seek to protect and enhance the setting of designated and non-designated heritage assets, and it may be possible to limit harm to heritage assets and their settings; in/around all settlements local impact assessments at site-specific stage, including for archaeology, would be required to test this.

Sustainability Appraisal Objective 7: Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place

Decision-Aiding Question (DAQ) 1: Minimise impact on, and where appropriate enhance, nationally designated landscapes and their settings and locally valued landscapes?

Whilst this strategic-level analysis appraises designated and locally-valued assets, local ones will become even more prominent during detailed / site-specific SA. At this stage, at and around the settlements, the following may be noted.

Trowbridge: principal local assets include scattered ancient woodland and historic parkland around the town's periphery. The Hilperton area is an example of good preservation of medieval landscape character, and the Kennet & Avon Canal is a valued feature.

Bradford on Avon: assets include the Cotswolds AONB to the west and south of the town, West Wiltshire Green Belt, Kennet & Avon Canal and Barton Farm Country Park.

Westbury: principal assets include Salisbury Plain special landscape area to the town's south, whilst greater coalescence with Dilton Marsh, Hawkeridge and the smaller settlements and farmsteads around Brokerswood could lead to adverse impacts on rural character.

Warminster: assets include Cranborne Chase & West Wilts AONB, Salisbury Plain special landscape area, and three prominent hill-forts.

DAQ 2: Protect rights of way, public open space and common land?

These features will be assessed in greater detail in successive rounds of sustainability appraisal when the analysis becomes more detailed.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Through this development strategy, adverse effects are likely in the Bradford on Avon area, where proposed levels of development, including a moderate quantum of employment, would likely have moderate adverse effects. The West Wiltshire Green Belt surrounds the town and the Cotswolds AONB borders the town to the west and south.	Bradford on Avon is characterised by designated landscape assets that include an Area of Outstanding Natural Beauty (AONB), West Wiltshire Green Belt, special landscape areas (SLA) and landscaped parks. This strategy proposes the same housing as TR-A but without employment. This rather moderate growth quantum would lead to likely moderate adverse effects because the capacity for growth under the landscape objective is deemed to be challenging.	The lowest proposed growth level at Bradford on Avon is under this strategy. Given the amount of development proposed it is considered that this would be likely to have minor adverse effects on landscape assets at/around this locality.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Trowbridge	A significant increase in growth through this strategy, suggests increased impacts on landscape assets. In addition to landscape assets highlighted above, large-scale urban expansion would need to maintain individual character at, and between, the rural settlements in the locality. The West Wiltshire Green Belt comes up to the edge of the town in the north and west, the villages of Hilperton, North Bradley and Southwick are in close proximity to the town and there are significant areas of ancient woodland to the south and east. All of these constraints limit the availability of sustainable development locations.	This strategy proposes a lower amount of growth compared with TR-A and TR-C, however significant levels of growth proposed at Trowbridge under all three strategies are considered likely to have moderate adverse effects that would be problematic to mitigate. The West Wiltshire Green Belt comes up to the edge of the town in the north and west, the villages of Hilperton, North Bradley and Southwick are in close proximity to the town and there are significant areas of ancient woodland to the south and east. All of these constraints limit the availability of sustainable development locations.	This strategy proposes a median amount of growth compared with TR-A and TR-C, however significant levels of growth proposed at Trowbridge under all three strategies are considered likely to have moderate adverse effects that would be problematic to mitigate. The West Wiltshire Green Belt comes up to the edge of the town in the north and west, the villages of Hilperton, North Bradley and Southwick are in close proximity to the town and there are significant areas of ancient woodland to the south and east. All of these constraints limit the availability of sustainable development locations.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	Warminster's assets include Cranborne Chase & West Wilts AONB to the south and west of the town, Salisbury Plain Special Landscape Area, and three prominent hill-forts. However, the landscape around Warminster is considered better able to accommodate this relatively low level of proposed growth without significant effects. Minor adverse effects are likely at this strategic assessment stage for all three strategies.	Warminster's assets include Cranborne Chase & West Wilts AONB to the south and west of the town, Salisbury Plain Special Landscape Area, and three prominent hill-forts. However, the landscape around Warminster is considered better able to accommodate this relatively low level of proposed growth without significant effects. Minor adverse effects are likely at this strategic assessment stage for all three strategies.	Warminster's assets include Cranborne Chase & West Wilts AONB to the south and west of the town, Salisbury Plain Special Landscape Area, and three prominent hill-forts. However, the landscape around Warminster is considered better able to accommodate this relatively low level of proposed growth without significant effects. Minor adverse effects are likely at this strategic assessment stage for all three strategies.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Westbury	Westbury's assets include Salisbury Plain special landscape area to the southeast of the town. There is potential risk of coalescence with nearby smaller settlements which would potentially lead to adverse	It is considered that Westbury may have the greatest scope for growth under this objective. There are no national landscape designations affecting Westbury and development would be possible, particularly to the north	Through this development strategy – similar to levels for TR-A, relatively less impacts are likely on landscape

	impacts on rural character. However, given the levels of growth are fairly low a minor adverse effect is therefore likely.	and west of the town, with few landscape constraints. However minor adverse effects on the landscape are likely.	assets. Minor adverse effects are therefore likely at this stage.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Rest of HMA	Under this strategy growth rates in Rest of HMA are elevated. The presence of large national designations (AONB) as well as locally-valued landscapes mean that locations in Rest of HMA would have to be selected very carefully with adequate mitigation to reduce landscape effects. Minor adverse effects are therefore considered most likely as the HMA is large enough to be able to locate development sustainably without leading to significant effects.	Under this strategy growth rates in Rest of HMA are elevated. The presence of large national designations (AONB) as well as locally-valued landscapes mean that locations in Rest of HMA would have to be selected very carefully with adequate mitigation to reduce landscape effects. Minor adverse effects are therefore considered most likely as the HMA is large enough to be able to locate development sustainably without leading to significant effects.	The presence of considerable areas of AONB, Green Belt, Special Landscape Area (SLA), and other locally-valued landscapes means that locations for development in Rest of HMA would have to be selected carefully. Growth levels are highest under this scenario and are considerably greater than TR-A and TR-B. Moderate adverse effects are likely since such development localities are still unknown.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Overall HMA score	-1.4 Overall, minor adverse effects are considered most likely, based on the assessment of all settlements/areas.	-1.4 Minor adverse effects are considered likely for the strategy overall, based on the assessment of all settlements/areas.	-1.4 Overall, minor adverse effects are considered most likely, based on the assessment of all settlements/areas.

Conclusions/Recommendations:

- **All strategies are assessed as having likely minor adverse effects on landscape overall and no one strategy is considered to be the more sustainable as they score equally.** However, all of these strategies are still considered likely to have significant landscape impacts in certain settlements/areas within the HMA.
- All growth scenarios, by varying degrees, direct a relatively high level of development to Trowbridge and environs, indicating likely significant adverse effects on landscape assets at a strategic level. Strategy TR-B directs comparatively less growth to Trowbridge, and it may be easier to mitigate successfully the adverse effects of new development on the landscape.
- Large-scale urban expansion at Trowbridge would need to maintain individual character at, and between, the rural settlements in the locality. The West Wiltshire Green Belt comes up to the edge of the town in the north and west, the villages of Hilperton, North Bradley and Southwick are in close proximity to the town and there are significant areas of ancient woodland to the south and east. Levels of growth at Trowbridge may need to be decreased to allow mitigation measures to reduce likely significant effects.
- Seeking to accommodate the proposed higher levels (TR-A and TR-B) of development at Bradford on Avon could also generate significant impacts upon national and local landscape assets. Significant adverse effects are thus indicated at a strategic level for these two strategies.
- Based on the above, it is recommended that in landscape terms, to seek to direct as much growth as possible away from Trowbridge and Bradford on Avon, and towards Westbury, Warminster and specific locations in the Rest of the HMA. Westbury and Warminster have fewer landscape constraints and could accommodate higher levels of growth, especially Westbury. The presence of considerable areas of AONB, Green Belt, Special Landscape Area (SLA), and other locally-valued landscapes means that locations for development in the Rest of the HMA would have to be selected carefully; lower growth levels may be able to be accommodated without likely significant effects.
- Landscape capacity assessments at site-specific stage would be required to test the detail of assertions. Localised improvements, e.g. green infrastructure, may be feasible, including significant tree-planting and open space provision throughout the HMA, where consistent with the landscape character context.

- Finally, as indicated above, there may be a rationale to exploring whether a percentage of Trowbridge's growth could be assigned to Westbury.

Sustainability Appraisal Objective 8: 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 Question (DAQ) 1: Provide an adequate supply of affordable housing?

Delivery of homes in **Trowbridge** since 2006 has been below planned rates. This is mainly due to delays in bringing forward the strategic allocation at Ashton Park. The anticipated rate of construction means that the site will be contributing to the supply of homes beyond 2026. The ratio of house price to earnings for the Trowbridge Community Area is lower than the Wiltshire average but has increased from 7.16 in 2008 to 8.00 in 2017. This reflects a trend seen nationally but may, in part, have been due to supply of homes in recent years being at a lower rate than planned for in the current WCS. 33.6% of completions during the period 1/4/09 – 31/3/18 have been affordable.

For **Bradford on Avon** the house price to earnings ratio has risen significantly from 9.84 in 2008 to 14.04 in 2017. The town is also highly constrained by Green Belt, considerably limiting land available for housing development. Overall the number of homes delivered has been broadly as planned in the WCS but only 22.8% of homes built during the period 1/4/09 – 31/3/18 were affordable homes, substantially below that required under Core Policy 43.

Housing delivery in **Warminster** since 2006 has also been below expected rates. This is primarily due to delays in bringing forward the strategic allocation to the west of the town. The site will therefore provide a supply of homes beyond 2026. In Warminster the ratio of house price to earnings has risen slightly from 7.85 to 8.83, marginally below the Wiltshire average. This reflects a trend seen nationally but may, in part, have been due to supply of homes in recent years being at a lower rate than planned in the current WCS, although 33.8% of all homes built since 2009 have been affordable housing, which is above the minimum target of 30%.

At **Westbury** the house price to earnings ratio has also increased slightly to 8.26, remaining below the average for Wiltshire but higher than the UK average, despite house building in recent years being marginally above planned levels. Affordable housing was 34.6% of all homes built between 1/4/09 – 31/3/18.

For the **Rest of the Housing Market Area** (the rural area) homes have been delivered at or above expected levels. Affordability ratios are, however, higher in rural areas, which reflects the limited supply of homes at large and small villages in recent years.

The updated housing requirement means that growth for the HMA will be marginally lower (by approximately 800 homes) than the number of homes allocated for 2006 – 2026 under the WCS. It is recognised that, as 65% of this proposed lower housing requirement for the Trowbridge HMA is already committed, the impact of new housing on affordability will be limited.

SA Conclusions relate to the ability of the strategy to deliver affordable homes where they are needed taking into account factors such as where house price to income ratios are highest.

DAQ 2: Support the provision of a range of house types and sizes to meet the needs of all sectors of the community?

Developments providing a mix of house types and sizes can be delivered on small or large sites. For this high-level stage of appraisal, it is difficult to make notable distinctions between the options. It is assumed that these matters would not necessarily be affected by the strategic distribution of housing and so no conclusions on this aspect of the strategic objective have been made at this stage.

DAQ 3: Deliver high quality residential development?

High quality developments providing a mix of tenures can be delivered on small or large sites. For this high-level stage of appraisal, it is difficult to make notable distinctions between the options in relation to the quality of housing or mix of dwelling sizes, types and tenures. It is assumed that these matters would not necessarily be affected by the strategic distribution of housing and so no conclusions on this aspect of the strategic objective have been made at this stage.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Under Strategy TR-A Bradford on Avon would be expected to deliver 520 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 260 dwellings. TR-A is one of the strategies which directs higher levels of housing to Bradford on Avon (although still modest) where affordability ratios are the highest and delivery of affordable housing lowest. Relative to strategy TR-C this could have a minor positive effect on Bradford on Avon. The affordability ratio would not be significantly affected given low growth proposed.	Under Strategy TR-B Bradford on Avon would be expected to deliver 520 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 260 dwellings. TR-B is one of the strategies which directs higher levels of housing to Bradford on Avon (although still modest) where affordability ratios are the highest and delivery of affordable housing lowest. Relative to strategy TR-C this could have a minor positive effect on Bradford on Avon. The affordability ratio would not be significantly affected given low growth proposed.	Under Strategy TR-C Bradford on Avon would be expected to deliver 275 dwellings from 2016-2036 – significantly lower than the other strategies. Taking into account existing commitments, this leaves a very small residual requirement of 15 dwellings. This strategy directs the lowest levels of housing to Bradford on Avon (effectively tying development to current commitments) The town has the highest affordability ratios and delivery of affordable housing lowest. Relative to strategy TR-A and TR-B this could have a minor adverse effect on the supply of affordable housing. The affordability ratio would not be significantly affected given low growth proposed.
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor adverse
Trowbridge	Under Strategy TR-A Trowbridge would be expected to deliver 5940 dwellings from 2016-2036, significantly higher than the other strategies. Taking into account existing commitments, this leaves a residual requirement of 2345 dwellings. Although delivery in Trowbridge has been slow, those that have been built have delivered affordable housing above 30% target levels. Continuation of the current strategy could, therefore, result in a moderate positive effect in terms of affordable housing supply at the principal settlement.	Under Strategy TR-B Trowbridge would be expected to deliver 4920 dwellings from 2016-2036 – significantly lower than the other strategies. Taking into account existing commitments, this leaves a residual requirement of 1325 dwellings. This distribution reduces the amount to be delivered at the principle settlement of Trowbridge (against the current strategy). Such a reduction, compared to the current strategy, would result in fewer affordable homes than strategy TR-A but there are still a substantial number of homes to be allocated in a location that has been delivering affordable housing above the target level of 30%. On balance, therefore, it is considered this strategy is likely to result in a minor positive effect on the supply of affordable homes at the principle settlement.	Under Strategy TR-C Trowbridge would be expected to deliver 5585 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 1990 dwellings. This distribution reduces the amount to be delivered at the principal settlement of Trowbridge (against the current strategy) by about 500 dwellings). Such a reduction, compared to the current strategy, would result in fewer affordable homes than strategy TR-A but there are still a substantial number of homes to be allocated in a location that has been delivering affordable housing above the target level of 30%. On balance, therefore, it is considered this strategy is likely to result in a moderate positive effect on the supply of affordable homes at the principal settlement.
	Likely effects: moderate positive	Likely effects: minor positive	Likely effects: moderate positive
Warminster	Under Strategy TR-A Warminster would be expected to deliver 1675 dwellings from 2016-2036 - lower than the other strategies. Taking into account existing commitments, this leaves no residual requirement to find.	Under Strategy TR-B Warminster would be expected to deliver 1950 dwellings from 2016-2036 - higher than the other strategies. Taking into account existing commitments, this leaves no residual requirement to find.	Under Strategy TR-C Warminster would be expected to deliver 1840 dwellings from 2016-2036. Taking into account existing commitments, this leaves no residual requirement to find.

	<p>This means that, apart from existing commitments, no additional dwellings would be required in the latter part of the plan period to 2036, resulting in a hiatus of activity. This is likely to have significant adverse effects on housing provision in the town, particularly for affordable housing.</p> <p>Likely effects: moderate adverse</p>	<p>This means that, apart from existing commitments, no additional dwellings would be required in the latter part of the plan period to 2036, resulting in a hiatus of activity. This is likely to have significant adverse effects on housing provision in the town, particularly for affordable housing.</p> <p>Likely effects: moderate adverse</p>	<p>This means that, apart from existing commitments, no additional dwellings would be required in the latter part of the plan period to 2036, resulting in a hiatus of activity. This is likely to have significant adverse effects on housing provision in the town, particularly for affordable housing.</p> <p>Likely effects: moderate adverse</p>
Westbury	<p>Under Strategy TR-A Westbury would be expected to deliver 1305 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 200 dwellings. This provides limited opportunity for the supply of affordable housing in a location that has been delivering housing slightly above anticipated rates and target levels of affordable housing. Consequently, there is likely to be a minor positive effect on the supply of affordable housing.</p> <p>Likely effects: minor positive</p>	<p>Under Strategy TR-B Westbury would be expected to deliver a significantly higher 1940 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 835 dwellings. Levels of housing to be identified at Westbury is increased in this strategy which provides an improved opportunity for the supply of affordable housing in a location that has been delivering housing slightly above anticipated rates and target levels of affordable housing. Consequently, there is likely to be a moderate positive effect on the supply of affordable housing at the town.</p> <p>Likely effects: moderate positive</p>	<p>Under Strategy TR-C Westbury would be expected to deliver 1395 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 290 dwellings. This provides limited opportunity for the supply of affordable housing in a location that has been delivering housing slightly above anticipated rates and target levels of affordable housing. Consequently, there is likely to be a minor positive effect on the supply of affordable housing.</p> <p>Likely effects: minor positive</p>
Rest of HMA	<p>Under Strategy TR-A the Rest of the HMA would be expected to deliver the lowest amount of 580 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 200 dwellings. A continuation of relatively low levels of housing growth at small and large villages is therefore likely to exacerbate affordability issues in these parts of the HMA. The opportunity for the delivery of affordable housing in rural areas is however limited by appropriate site size and therefore the quantity of new affordable homes is likely to be small. These factors on balance are likely to result in a minor adverse effect on the supply of affordable homes in the rest of the HMA.</p> <p>Likely effects: minor adverse</p>	<p>Under Strategy TR-B the Rest of the HMA would be expected to deliver 865 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 485 dwellings. The provision of homes in the rural areas under this strategy would broadly match rates seen in the past 10 years (which have been above WCS rates) but could potentially be targeted to help to support the vitality of rural areas, where a need has been identified. Therefore, overall, a small increase in levels of housing growth at small and large villages under Strategy TR-B is unlikely to be sufficient to address affordability issues in the rural parts of the HMA. This strategy would therefore be likely to result in a neutral effect on the supply of affordable homes in the rest of the HMA.</p> <p>Likely effects: neutral</p>	<p>Under Strategy TR-C the Rest of the HMA would be expected to deliver a significantly higher 1095 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 715 dwellings. Despite the higher amount proposed, a continuation of relatively low levels of housing growth at small and large villages is likely to exacerbate affordability issues in these parts of the Rest of the HMA. The opportunity for the delivery of affordable housing in rural areas is however limited by appropriate site size and therefore the quantity of new affordable homes is likely to be small. These factors on balance is likely to result in a minor positive effect on the supply of affordable homes in the rest of the HMA.</p> <p>Likely effects: minor positive</p>
Overall HMA score	<p>0.2 Neutral effects are considered likely for this strategy overall, based on the assessment of all settlements/areas.</p>	<p>0.4 Neutral effects are considered likely for this strategy overall, based on the assessment of all settlements/areas but benefits will be greater than strategies TR-A and TR-C.</p>	<p>0.2 Neutral effects are considered likely for this strategy overall, based on the assessment of all settlements/areas.</p>

Conclusions/Recommendations:

- Based on scores overall across all settlements/areas, although TR-A and TR-B both have neutral effects overall, **Strategy TR-B is considered the most sustainable strategy** against this objective as it is likely to have greater sustainability benefits than the other strategies. TR-B would ensure the remaining housing requirement would be distributed more evenly across the HMA which is considered more likely to result in greater positive effects than Strategies TR-A and TR-C, in terms of the provision of affordable homes.
- **Strategy TR-C is considered the least sustainable strategy** as it is considered likely to have minor adverse effects overall. TR-C would be the least likely to provide affordable homes where they are most needed with significant adverse effects occurring both in Bradford on Avon and in Warminster.
- Overall the housing requirement for the Trowbridge HMA is lower (by approx. 800 dwellings) than for the current plan period. However, this requirement is based on an assessment of need and therefore is not, in itself, an indication of a negative effect. None of the strategies under consideration are likely to have significant benefits against this objective. To increase the benefits for affordable and market housing provision in this HMA, the overall requirement would need to be significantly higher.
- Strategy TR-B, although considered the most sustainable strategy overall, allocates the lowest number of homes to the Principal Settlement of Trowbridge, which would affect a continuation of historic delivery of dwellings at the town. For significant benefits against this objective at Trowbridge, levels of growth would need to be increased, for example, on a par with TR-A.
- In Bradford on Avon the house price to earnings ratio has risen significantly from 9.84 in 2008 to 14.04 in 2017. The town is also highly constrained by Green Belt, considerably limiting land available for housing development. It is unclear whether the affordability ratio would be significantly affected given low growth proposed in any of the strategies and the housing requirement should be increased to have greater impacts. The provision of affordable housing at Bradford on Avon should be prioritised to meet identified needs, perhaps through application of a specific affordable housing policy requirement for the town that is higher than for other parts of Wiltshire, subject to viability testing.
- At Warminster, taking into account existing commitments, all of the strategies would result in a residual requirement of 0 dwellings. This means that, apart from existing commitments, no additional dwellings would be required in the latter part of the plan period to 2036, resulting in a hiatus of activity. This is likely to have significant adverse effects on housing provision in the town, particularly for affordable housing, and there would need to be a significant increase in the housing requirement to increase the benefits at Warminster.
- At Westbury, the only strategy likely to have significant benefits is TR-B which proposes a significantly higher amount of growth. TR-B provides an improved opportunity for the supply of affordable housing in a location that has been delivering housing slightly above anticipated rates and target levels of affordable housing. It is considered that Westbury could accommodate an even higher requirement to increase the benefits further.
- In the Rest of the HMA, strategies TR-A and TR-B would not be likely to have benefits overall for the rural villages as a continuation of relatively low levels of housing growth at small and large villages is likely to exacerbate affordability issues in rural parts of the HMA. The only strategy likely to offer any benefits, and even then, is unlikely to have a great effect on affordability issues i.e. reverse the trend, is TR-C, but the level proposed is only likely to have minor benefits. The requirement would need to be significantly increased in rural areas for any significant change in the upward trend to occur. It is recognised that the opportunity for the delivery of affordable housing in rural areas is however limited by appropriate site size and therefore the quantity of new affordable homes is likely to be small. A rural facilities survey should be undertaken to identify where the provision of homes could be targeted to help support the vitality of rural settlements in the HMA.

Sustainability Appraisal Objective 9: Reduce poverty and deprivation and promote more inclusive communities with better services and facilities.

Decision-Aiding Question (DAQ) 1: Maximise opportunities within the most deprived areas?

Within the Trowbridge HMA there are areas of deprivation in **Trowbridge and Westbury**. There is a risk of social isolation among older people at all of the settlements in this HMA.

Trowbridge suffers from areas of high deprivation, with 15% of the local population living in areas of high deprivation. Additionally, a higher than Wiltshire wide average number of children and young people live in low-income families.

Westbury has pockets which suffer from deprivation, with 8% of the residents living in areas of high deprivation. Additionally, a higher than Wiltshire wide average number of children and young people live in low-income families and a higher than average rate of 0-25 years olds supported by Children’s social care.

Warminster is subject to a higher than average rate of 0 to 25-year olds supported by children’s social care.

DAQ 2: Be accessible to educational, health, amenity greenspace, community and town centre facilities which are able to cope with the additional demand?

The three secondary schools in **Trowbridge** may be at or exceeding capacity from existing planned housing by 2026, a new secondary school may be secured as part of the known development at Ashton Park, but additional land would be needed to meet the needs of further development. New primary provision is expected to be required, although there is limited scope to expand existing provision. There are high levels of investment planned in health services in Trowbridge, although the GP capacity gap is pronounced. The Trowbridge area had the highest gap in provision in the Wiltshire CCG in September 2016 (-1,050m²). The gap is expected to increase to -1,215m² by 2026.

A **Bradford on Avon** there is an issue with GP capacity (-177m² in 2016), but this is expected to decrease by 2026. The main issue with any development in this settlement is that there is no existing primary and secondary school capacity in Bradford on Avon and limited scope to increase provision. Additionally, St Laurence Academy is currently serving residents of Trowbridge and additional housing in Bradford on Avon could increase demand for school places in Trowbridge.

Warminster requires a significant amount of development to address the secondary school capacity issues. In meeting the current demand, a site for a new school is looking to be secured as of Aug 2019. Primary provision is expected to be at capacity following military moves, with little ability to expand existing provision and additional provision is expected to be delivered through the West Urban Extension. Substantial levels of development would be needed to support a new secondary or primary school, in addition to limited site options. However, there is a small GP capacity gap for Warminster, which is expected to increase to -204m² by 2026.

Westbury is likely to require expansion of Matravers School to meet any new demands for up to 1000 additional homes, although there is some existing capacity at present. Primary schools in the area are also subject to some surplus capacity, but as these places are expected to be filled by known growth, additional primary provision is expected to be required in the near future. Therefore, a limited amount of growth could be accommodated in existing provision, but substantial additional housing would require new provision. With relation to the NHS, the local community hospital has closed and a small GP capacity gap is forecast for 2026 (-30m²).

DAQ 3: Promote/create public spaces and community facilities that might support public health, civic, cultural, recreational and community functions?

For this high-level stage of appraisal, it is difficult to make notable distinctions between the options in relation to public spaces and community facilities. It is assumed that these matters would not necessarily be directly affected by the strategic distribution of housing and so no conclusions on this aspect of the strategic objective have been made at this stage.

DAQ 4: Reduce rural isolation, including access to affordable services for those without a car in rural areas?

Rural areas suffer from lack of access to services and facilities, so focusing development in the Rest of the HMA areas without promoting services alongside could lead to more isolation. However, housing affordability is an issue in the Rest of the HMA therefore housing development in these areas can potentially address this issue.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Proportionately low levels of growth are proposed for Bradford on Avon. Low rates of development are not considered to be able to help overcome existing	This strategy proposes proportionately low levels of growth for Bradford on Avon. This is an equivalent of the roll forward (TR-A). As with TR-A, low rates of development are	This strategy proposes a significantly lower level of growth than TR-A and TR-B. New development is considered likely to be more positive than negative in terms of

	<p>education and health service capacity issues. However, there should be benefits overall in terms of new jobs from 1ha employment provision and provision of some affordable housing. Provision of 520 new dwellings and 1ha employment is considered likely to have minor benefits against this objective. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities.</p>	<p>not considered to be able to help overcome existing education and health service capacity issues. However, there should be benefits overall in terms of provision of some affordable housing. Provision of 520 new dwellings is considered likely to have minor benefits against this objective. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities.</p>	<p>reducing poverty and deprivation and promoting more inclusive communities. However, 275 dwellings are considered likely to make little difference overall for the town. Therefore, neutral effects are most likely.</p>
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: neutral
Trowbridge	<p>Continuing the current strategy would lead to a proportionately moderate level of growth for Trowbridge. This level of growth may place additional pressures on existing services and facilities – there is currently significant pressure on health and education facilities in the town. However, it could also lead to investment in key services and is likely to have a positive effect on reducing poverty and deprivation, health and education in Trowbridge. This level of growth is comparatively higher than those proposed by the other strategies and would provide the greatest benefits. Thus, this strategy is likely to have moderate positive effects on objective 9.</p>	<p>This strategy proposes the lowest level of housing growth at Trowbridge and no employment is proposed. This level of growth may place additional pressures on existing services and facilities – there is currently significant pressure on health and education facilities in the town. However, it should also have benefits in terms of provision of affordable housing and new or expanded education/community/cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Overall, moderate positive effects are considered likely.</p>	<p>A moderate level of growth proportionate to the settlement of Trowbridge is proposed. This level of development could be capable of leading to investment in services and this strategy is likely to lead to a positive effect on reducing poverty and deprivation, health and education in Trowbridge. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. This level of growth is lower than rolling forward the current strategy. However, overall, TR-C is likely to have moderate positive effects on this objective.</p>
	Likely effects: moderate positive	Likely effects: moderate positive	Likely effects: moderate positive
Warminster	<p>Proportionately low and similar levels of growth are proposed in all strategies for Warminster, with no employment allocation. Warminster requires a significant amount of development to address the secondary school capacity issues. However, this strategy should also have some benefits in terms of provision of affordable housing and new or expanded education/community/ cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and</p>	<p>Proportionately low and similar levels of growth are proposed in all strategies for Warminster, with no employment allocation. Warminster requires a significant amount of development to address the secondary school capacity issues. However, this strategy should also have some benefits in terms of provision of affordable housing and new or expanded education/community/ cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities.</p>	<p>Proportionately low and similar levels of growth are proposed in all strategies for Warminster, with no employment allocation. Warminster requires a significant amount of development to address the secondary school capacity issues. However, this strategy should also have some benefits in terms of provision of affordable housing and new or expanded education/community/ cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities.</p>

	deprivation and promoting more inclusive communities. Overall, minor positive effects are considered likely.	Overall, minor positive effects are considered likely.	Overall, minor positive effects are considered likely.
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor positive
Westbury	Proportionately low levels of growth are proposed for Westbury. Development at Westbury could help overcome issues of deprivation and an emerging GP capacity gap. School expansion/ additional provision may be required to meet the needs of new development beyond 2026. This strategy, along with Strategy TR-C has the lowest comparative amount of development proposed at Westbury. It is unclear at this stage whether low levels of development would be capable of reducing poverty and deprivation, lack of GP capacity and school expansion. Overall, the strategy is likely to have minor positive effects for Westbury for this objective.	Strategy TR-B proposes significantly higher levels of growth at Westbury proportionate to the settlement. When compared to TR-A and TR-C, higher levels of development at Westbury could help overcome issues of deprivation and an emerging GP capacity gap. Further, this strategy has the highest amount of development allocated to Westbury compared to the other strategies. Despite limited opportunities to expand existing schools, there is some surplus capacity apparent. It is likely that it could have overall moderate positive effects for Westbury for this objective.	Strategy TR-C proposes a slightly higher level than the roll forward of the Core Strategy, however this remains a low level in proportion to the settlement. Development at Westbury could help overcome issues of deprivation and an emerging GP capacity gap. Secondary school expansion/additional provision is likely to be required. Overall, the strategy is likely to have minor positive effects on Westbury for this objective. It is unclear at this stage whether low levels of development would be capable of overcoming issues of deprivation, lack of GP capacity and school expansion.
	Likely effects: minor positive	Likely effects: moderate positive	Likely effects: minor positive
Rest of HMA	There is an opportunity for growth in rural areas to lead to increased access to services and facilities, reducing rural isolation, but there is a degree of uncertainty at this stage, particularly regarding the location of development. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities, but benefits are not likely to be significant. Overall, minor positive effects are considered likely.	There is an opportunity for growth in rural areas to lead to increased access to services and facilities, reducing rural isolation, but due to the degree of uncertainty at this stage, particularly regarding the location of development. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities, but benefits are not likely to be significant. This strategy proposes a higher level of growth than the roll forward, but at this stage minor positive effects on the Rest of the HMA for objective 9 are considered likely.	This strategy proposes the highest level of growth when compared with the roll forward. There is an opportunity for growth in rural areas to lead to increased access to services and facilities, reducing rural isolation. A degree of uncertainty remains at this stage, particularly regarding the location of development. This strategy has the largest amount of scope to lead to positive effects on the Rest of the HMA. At this stage it is considered likely that there will be moderate positive effects on the Rest of the HMA for objective 9.
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: moderate positive
Overall HMA score	1.2 Overall, this strategy is likely to have minor positive effects on objective 9.	1.4 Overall, this strategy is likely to have minor positive effects on objective 9.	1.2 Overall, this strategy is likely to have minor positive effects on objective 9.

Conclusions and Recommendations:

- Based on scores overall across all settlements/areas, all strategies are likely to have minor positive effects against this objective. However, **Strategy TR-B is the most sustainable option** as it will lead to the greater number of benefits overall.
- **Strategies TR-A and TR-C score equally and are considered the least sustainable strategies** as they will have fewer benefits than TR-B.

- New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities because development can provide new jobs, affordable housing, new or expanded education/community/cultural/recreational facilities, and create new areas of public open space and green infrastructure that could help reduce social isolation and allow greater levels of physical exercise. All strategies promote the same overall level of development and therefore score similarly against this objective. Increasing levels of growth in all settlements/areas, providing there is commensurate investment in infrastructure, services and facilities, is likely to have a positive effect on this objective.
- At Trowbridge, all strategies have relatively high development focused on the town, which means all strategies promote development which is likely to benefit from good access to the services/facilities that Trowbridge offers and could help support areas of deprivation. Significant benefits are likely for all strategies, although no employment provision is proposed which would increase benefits against this objective. At this stage, evidence suggests that new secondary school provision can be supported by higher levels of growth in Trowbridge or Westbury. Strategies TR-A and TR-C are more capable of supporting a new school at Trowbridge.
- Strategies should take the opportunity to invest in health services and facilities, where possible. This is particularly important in the Trowbridge area as there is a substantial GP capacity gap.
- Any growth in Westbury will have to balance the positive impacts of development, including provision of affordable housing, against the potential negative impact on schools, particularly at secondary level. Strategy TR-B is the most favourable of the strategies; it proposes significantly higher levels of growth at Westbury proportionate to the settlement. When compared to TR-A and TR-C, higher levels of development at Westbury could help reduce issues of deprivation, an emerging GP capacity gap and be more likely to improve the issue of secondary school capacity. Despite limited opportunities to expand Matravers school, higher levels of growth at Westbury are needed if a new or expanded secondary school is to be provided.
- At Bradford on Avon, the low rates of development proposed for all strategies are not considered to be able to help overcome existing education and health service capacity issues. However, there should be benefits overall and TR-A proposes a small amount of employment provision. For significant benefits to occur at the town, however, a significantly higher level of growth, both housing and employment, would need to be allocated.
- Warminster requires a significant amount of development to address school capacity issues, although no strategy facilitates this as they all propose low levels of growth. In order to achieve greater benefits against this objective, growth rates at Warminster would need to be significantly higher for all strategies.
- Development in the Rest of the HMA, where higher levels are proposed through Strategy TR-C, is considered to have significant benefits on this objective. There is an opportunity for growth in rural areas to lead to increased access to services and facilities, reducing rural isolation and some additional affordable housing, but there is a degree of uncertainty at this stage regarding the location of development. TR-C has the greatest scope to lead to benefits for rural communities.
- For new development to be effective in reducing poverty and deprivation and promoting more inclusive communities, it will be very important that all new housing development includes a range of house types/tenures and a level of affordable housing that will actually help reduce the affordability ratio, which is particularly high in Bradford on Avon and in the rural parts of the HMA. All new development should provide the essential services and facilities that are needed to avoid increasing pressure on existing services and also reduces the need to travel and reduces out-commuting.
- New development can cause pressure on existing services and facilities in the short-term and needs to be accompanied by adequate infrastructure to meet the needs of new residents. This is especially the case regarding transport, healthcare and education where services are under pressure across much of the area. Additional primary and secondary school capacity would need to be found at all of the settlements. Increasing the levels of growth proposed could enable new educational facility supply but could also lead to pressure on other services.

Sustainability Appraisal Objective 10: Reduce the need to travel and promote more sustainable transport choices

Decision-Aiding Question (DAQ) 1: Promote mixed use developments, in accessible locations, that reduce the need to travel and reliance on the private car?

Limited notable observations are possible at this stage in relation to this DAQ. Further consideration will be given to these matters at a later, more site specific, stage where more precise accessibility, development mix and travel options become clearer. Where observations can be made at this strategic stage, they have been made below.

Each of the main settlements within this HMA possess both a rail link and bus travel options as alternatives to private car travel. When looking at the rest of the HMA, many of these locations are positioned in less accessible locations than the market towns and principal settlements and may increase the reliance on the private car, often being positioned further away from many amenities or public transport services.

DAQ 2: Provide suitable access and not significantly exacerbate issues of local transport capacity (unless there is evidence that such impacts can be mitigated)?

The below observations provide a brief strategic overview of certain key strategic constraints at each location. At this stage of appraisal, it is difficult to make notable observations on the precise suitability of access along with the impacts on local transport capacity. More detailed assessment will be possible at the site assessment stage where impacts along with mitigation/improvement measures will become clearer.

Bradford on Avon hosts a largely historic road layout offering some narrow roads with a single river crossing for the A363. These factors can lead to congestion at peak periods. Mitigation measures to combat this appear to be limited at this stage.

The highway network within **Trowbridge** suffers from peak hour congestion in the town centre and into key destinations. In terms of known likely mitigation, a Trowbridge Transport Strategy has been developed that highlights key junction improvements within Trowbridge and along the A350.

Within **Warminster** pressure currently exists on east to west routes via Warminster town centre as only two routes currently facilitate this internal movement. This pressure is also elevated by the town centres linear high street, resulting in cross-town traffic problems. AM and PM peak hour delays also occur on the B3414 High Street / Market Place and Station Road impacting travel time reliability.

Westbury's main transport link is comprised of the A350 which suffers from peak time congestion on its route through the town centre causing local social and environmental impacts. Peak hour delays on the A350 and into key destinations can impact travel time reliability.

Within the **Rest of HMA**, links to the highway network vary as do the levels of existing transport capacity. That being said, the majority of settlements in the rest of HMA will likely be less accessible to services and increase the likelihood of increasing usage of transport corridors with lower levels of capacity.

DAQ 3: Make efficient use of existing transport infrastructure?

The below observations provide a brief strategic overview of certain elements of the existing transport infrastructure in each broad location that could be utilised sustainably if growth were to take place. At this stage of appraisal, it is difficult to make notable observations on the precise potential efficient use or impacts upon the existing transport infrastructure. More detailed assessment will be possible at the site assessment stage where the potential for utilisation or improvements to the existing transport infrastructure will become clearer.

Highway accessibility within **Bradford on Avon** mainly lies with the A363 running through the town providing links to surrounding settlements and linkages to the A4 and A350. A number of radial B roads also connect the town to other surrounding settlements. Rail and bus options, depending on the location of development, could offer suitable alternatives to private car travel.

Trowbridge, in highway terms, provides accessibility to the wider transport network via the A350 and the A361. Rail and bus options, depending on the location of development, could offer suitable alternatives to private car travel.

Warminster lies on the A36 / A350 providing direct links to west Wiltshire, Bath, Salisbury and the south coast. The A36 provides a bypass for Warminster and alleviates the majority of through traffic while most of the town is subject to a 7.5 tonne weight restriction. Rail and bus services offer opportunities to provide alternatives to private car travel.

Accessibility in **Westbury** largely lies with the A350 primary route. Rail and bus services offer opportunities to provide alternatives to private car travel.

The often rural nature of the rest of the HMA leads to a large variance in the nature and availability of transport infrastructure, both in public transport and highway terms. Existing sustainable transport infrastructure in the rest of the HMA is often limited due to the remote location of certain areas with in-frequent public transport services and accessibility. Efficient use of existing transport systems in these locations is consequently more likely to be constrained by the lack of current infrastructure.

DAQ 4: Provide the opportunity to create additional sustainable transport infrastructure including safe active travel?

The below observations provide a brief strategic overview of the existing sustainable transport provision and pedestrian environment in each broad location that provide opportunity for enhancement moving forward. At this stage of appraisal, it is difficult to make notable observations on the precise opportunities to enhance safe active travel without knowing the spatial distribution of growth within each location. More detailed assessment should be possible at the site assessment stage where the opportunities to create additional sustainable transport infrastructure may become clearer.

Bradford on Avon hosts rail and bus services that are well utilised which is reflected by the comparatively high modal share of rail usage in the community area and the commercially strong 265 bus service. These services, namely those to outlying settlements, can be limited unless they lie on key routes while rail services don't connect directly to Chippenham or Swindon. This highlights a couple of areas that could, depending on the viability of such measures, provide future opportunities. In terms of active travel, the volume of traffic together with the narrow streets and footways can provide for a less appealing pedestrian environment. This in combination with the historic fabric of the town, hilly topography and environmental constraints (River Avon, Kennet and Avon Canal and railway line) may reduce the number of opportunities to enhance the active travel options within the town. Opportunities that do exist include; the Wiltshire Cycleway (on road leisure route); the cycle route along the A363 between Bradford on Avon and Trowbridge; National Cycle Network route 4 following the Kennet and Avon Canal Towpath.

Existing sustainable transport services within **Trowbridge** include bus links to locations within and outside of the town and the railway station offering links, including trans Wiltshire links. Both the bus and rail service provide opportunity to further enhance sustainable transport usage into the future. Pedestrian links include National Cycle Network route 4 which passes through Trowbridge along the Kennet and Avon canal tow path with further opportunities being outlined within the Trowbridge Town Cycle Network plan.

Enhancing sustainable transport options in **Warminster** include options to enhance the bus routes, already offering services to west Wiltshire, Bath and Salisbury along with the town bus service linking those areas lying away from the inter-urban routes. Similarly, Warminster rail station provides good connectivity within and beyond the county. From a pedestrian perspective National Cycle Network route 24 passes through the south area of the town comprising a mixture of on-road routes, quieter roads, rights of way and permissive routes. The Warminster Town Cycle Network plan focuses on the town and extends to most areas and urban extensions.

Westbury hosts bus links from most of the residential areas to the town centre and surrounding settlements while also acts as a significant rail hub. This railway link is situated about 1.3km from the town centre and bus network connectivity to this service could be improved, both of which offer opportunities for enhancement of the public transport offer in Westbury. The pedestrian environment in Westbury is impacted upon by the A350 and Station Road which provide a poor walking and cycling environment. The severance caused by the Westbury Avoiding Line (rail route) and the rail routes through the station result in poor connectivity between the residential parts of Westbury and the major business sites. The Westbury Town Cycle Network plan focuses on the town and highlights opportunities.

Within the **Rest of the HMA** there is relatively poor cycle network provision in the rural hinterland and while settlements are connected by Public Rights of Way, the quality and visibility of these routes vary. The bus services are often limited or in-frequent, particularly in more sparsely populated rural areas, though it is acknowledged that growth of towns and villages may offer the opportunity to make some public transport services more viable to these areas.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	TR-A is one of the strategies directing comparatively more housing growth to Bradford on Avon (although still proportionately low) along with, in this option, a small quota of employment. While being proportionately low, this level of development is assessed as having a likely minor adverse effect against this objective with mitigation to alleviate further congestion and the ability to maximise active travel appearing more complex at this stage.	TR-B is one of the strategies directing comparatively more housing growth to Bradford on Avon (although still proportionately low). While being proportionately low this level of development is assessed as having a likely minor adverse effect against this objective with mitigation to alleviate further congestion and the ability to maximise active travel appearing more complex at this stage.	TR-C directs proportionately and comparatively low levels of housing growth to Bradford on Avon. Given the low figure this level of development is assessed as having a likely neutral effect against this objective at this stage.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: neutral
Trowbridge	Focusing development at Trowbridge may take advantage of key sustainable transport services, however given Trowbridge town centre suffers from peak time delays the subsequent impact this level of development may have on congestion and subsequently both private and public transport must be considered. Given the level of growth is relatively high and the mitigation measures remain unclear at this stage, this location for growth is currently assessed as having a moderate adverse effect against this objective.	Proportionately less growth is focussed on Trowbridge however the figure remains relatively high. Focusing this level of development here may take advantage of key services however given Trowbridge town centre suffers from peak time delays the subsequent impact this level of development may have on congestion and subsequently both private and public transport must be considered. With mitigation and likely effects of this level of growth remaining unclear, this location for growth is currently assessed as having a moderate adverse effect against this objective.	Focusing this proportionately moderate level of growth at Trowbridge may take advantage of key sustainable transport services, however given Trowbridge town centre suffers from peak time delays the subsequent impact this level of development may have on congestion and subsequently both private and public transport must be considered. Given the mitigation measures remain unclear at this stage, this location for growth is currently assessed as having a moderate adverse effect against this objective.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	At Warminster this alternative development strategy effectively ties growth to current level of commitments. Growth at this proportionately low level is assessed as having a likely minor adverse effect against this objective.	While marginally higher, a proportionately low level of growth is proposed at Warminster. Growth at this proportionately low level is assessed as having a likely minor adverse effect against this objective.	At Warminster this alternative development strategy effectively ties growth to current level of commitments. Growth at this proportionately low level is assessed as having a likely minor adverse effect against this objective.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Westbury	At Westbury this proportionately lower level of development is currently assessed as having a minor adverse effect against this objective given the ability to mitigate additional congestion and maximise sustainable transport usage is currently unknown.	The higher level of proportionate growth being focussed on Westbury is currently assessed as having a moderate adverse effect given the extent to which mitigation can combat additional congestion and maximise sustainability is currently unknown. It is acknowledged that employment growth is also suggested under this strategy for Westbury, while it could be argued this may provide an opportunity to enhance sustainable and active travel and increase self-	At Westbury this proportionately lower level of development is currently assessed as having a minor adverse effect against this objective given the ability to mitigate additional congestion and maximise sustainable transport usage is currently unknown.

		containment, precise assessment of this effect is not yet possible.	
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	A continuation of the current levels of growth in the rest of HMA may place growth in locations with reduced access to sustainable modes of transport. For development to mitigate this effect it would need to improve the availability of sustainable transport provision and accessibility. Given the extent to which this is possible remains unclear at this stage. This level of growth in the Rest of HMA is assessed as having a minor adverse effect against this objective.	While relatively low growth continues to be identified for the rest of HMA growth in these locations may place development in locations with reduced access to sustainable modes of transport. For development to mitigate this effect it would need to improve the availability of sustainable transport provision and accessibility. Given the extent to which this is possible remains unclear at this stage. This level of growth in the Rest of HMA is assessed as having a minor adverse effect against this objective.	Focusing a higher level of growth, both housing and employment, in the rest of HMA may place development in locations with reduced access to sustainable modes of transport. For development to mitigate this effect it would need to improve the availability of sustainable transport provision and accessibility. This relatively moderate level of growth in combination with the uncertainty over the geographical location of growth and the level to which sustainability may be achieved means this level of growth in these locations is currently assessed as having a moderate adverse effect against this objective.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Overall HMA score	-1.2 Overall, minor adverse effects are considered most likely, based on the assessment of all settlements/areas.	-1.4 Overall, minor adverse effects are considered most likely, based on the assessment of all settlements/areas.	-1.2 Overall, minor adverse effects are considered most likely, based on the assessment of all settlements/areas.

Conclusions/Recommendations:

- Strategies **TR-A and TR-C** have less adverse effects overall. **Both strategies score equally and are the most sustainable.**
- **Strategy TR-B is considered the least sustainable** as it has the greatest adverse effects overall, with significant effects likely in both Trowbridge and Westbury.
- All strategies are considered likely to have minor adverse effects overall. However, those settlements and areas that have the highest levels of proposed growth i.e. Trowbridge (all strategies), Westbury (TR-B) and Rest of HMA (TR-C) are likely to have significant effects with mitigation likely to be problematic.
- Transport issues within the Trowbridge HMA are largely focussed on trying to maximise the use and availability of sustainable modes of transport along with managing levels of congestion on strategic routes and in town centres. This can impact upon private and public transport, as well as impacting the strategic role of key routes running through each location. Overall, the level of growth proposed across the strategies is considered likely to increase traffic levels generally, and the impact of this must be taken into consideration when considering options moving forward.
- Trowbridge - has been identified as having a relatively high level of growth across all the strategies though proportionately, the figure is slightly lower for strategy TR-B. As has been highlighted, Trowbridge benefits from good strategic transport links along with access to a wide range of sustainable transport services. While it is beneficial to locate development in such locations, the significance of effect for all strategies is reflective of the level of risk that comes with this level of growth in a town that has been identified as suffering from peak time congestion on some key strategic routes. Likely effects are somewhat uncertain given the acknowledgment that mitigation could manage this level of growth to ensure congestion is managed and sustainability maximised. Equally the uncertainty reflects that assessment is likely to change once further detail emerges around the sustainability of development in transport terms and the mitigation possible that may vary in different locations.

- Westbury – effects vary fairly significantly across the strategies. Westbury is located on the A350 primary route which passes through the town centre causing delays on the current road layout. While bus and rail services are available, this congestion can impact on both private and public transport provision. The options identifying proportionately lower levels of growth at Westbury, namely TR-A & TR-C, while having a lower assessed impact against this objective, may preclude the viability of highway improvement measures that could accompany larger levels of growth. Similarly, while the impact of the relatively higher level of growth identified in TR-B has been identified as significant, this is associated with the risk that comes with this level of development to a town struggling with congestion on a primary route. This uncertainty reflects that the assessment is likely to change once further detail emerges around the sustainability of development in transport terms and the mitigation possible that can vary in different locations with differing levels of development.
- Bradford on Avon - is identified as having congestion problems on the A363 with the historic fabric of the town, its hilly topography and environmental constraints not only precluding clear road infrastructure mitigation but also restricting active travel connectivity. Although bus and rail services offer sustainable transport options within the town. With these factors in mind, and the impact further development may have on; the road network; the reliability of sustainable transport; and the poor pedestrian environment, the levels of development suggested within strategies TR-A & TR-B are currently assessed as having likely negative effects. Significant effects are not apportioned as the low level of development in association with the sustainable transport options available offer the opportunity to manage impacts through sustainability methods. However, the impact on the restricted road network would need to be carefully monitored.
- Low levels of growth are proposed at Warminster across all the options. Warminster presents good public transport provision by rail and bus. Growth at this level is unlikely to have a major impact however it will need to be monitored against the risk factors present including town centre and peak hour traffic congestion effecting private and public transport. It is considered that growth levels at Warminster could be higher without significantly impacting on the aims of this objective.
- While growth in the Rest of the HMA, with higher levels in strategy TR-C, places development away from established sustainable transport provision, development here may facilitate and improve the viability of new sustainable transport options reaching more rural communities. At this stage, development in these locations has been assessed negatively against this objective (moderately so at higher levels) mainly due to the likelihood that it will not make efficient use of existing sustainable transport infrastructure and may increase private car usage. However further work establishing the level of development required in certain locations to facilitate investment and improvements in sustainable transport options may change this assessment and clarify the sustainability of the rest of HMA, hence some uncertainty regarding the assessments at this stage.
- It's considered key to locate development at locations that make efficient use of existing transport infrastructure and can facilitate advancements in the use of sustainable transport. Therefore, favourable locations should be in well-connected areas that benefit from good accessibility to a wide range of sustainable transport options, or in locations that can facilitate improvements in such factors.
- Development should contribute to improving sustainable transport networks; this includes linking town centres with development sites as well as linking settlements together. Development proposals should carefully consider schemes to significantly reduce private car use. Strong investment may be required to improve public transport services and safe walking/cycling links, particularly within the town centres.
- Mixed-use development proposals are recommended as this will help increase self-containment and reduce need to travel.
- Significant new highway infrastructure may be necessary in Trowbridge and Westbury along with the rest of the HMA if certain levels of growth in the strategies are taken forward.
- More detailed transport assessments may be necessary to understand in detail the impact of certain levels of development on settlements and communities to understand the impacts and possible mitigation measures that can be put in place to improve congestion hot spots and sustainable transport provision.

Sustainability Appraisal Objective 11: Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth

Decision-Aiding Question (DAQ) 1: Support the vitality and viability of town centres (proximity to town centres, built up areas, station hub)?

The relationship with the town centre, and its immediate and wider rural context is complex and will also rely on trade from retail and non-retail businesses. Additional growth will inevitably contribute, to some extent, to the vitality and viability of town centres. At this stage, in the absence of specific site options to consider, the proximity of future housing and employment development to the town centres cannot be determined and therefore will not be considered as part of this high-level assessment but will be assessed at later stages.

DAQ 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?

The Local Plan Review is at an early stage of preparation and, consequently, details of the distribution and range of employment uses that will be provided is not known. Therefore, for this high-level stage of appraisal it is difficult to make notable distinctions between the options against this objective. It is assumed that these matters would not necessarily be affected by the strategic distribution of employment land and so no conclusions on this aspect of the strategic objective have been made at this stage.

DAQ 3: Contribute to the provision of infrastructure that will help to promote economic growth?

The provision of housing and employment will require sufficient infrastructure to be in place to ensure that it is acceptable. This will largely be achieved through s106 contributions for those directly related to the development. CIL funds and grant funding will ensure the provision of strategic infrastructure. The quantum of homes and employment land to be delivered is the same for each of the strategies and therefore should result in the contributions towards infrastructure on a similar scale, albeit applicable to specific areas. The provision of infrastructure will need to be considered and tested further at the site options stage.

DAQ 4: Promote a balance between residential and employment development to help reduce travel distances to work?

Wiltshire has large flows of commuters into and out of the county, with an overall net outflow of commuters. The majority of movement is to and from Swindon and Bath & North-East Somerset. 56% of people travel to work by car, 13% by foot and 5% by public transport. Self-containment in Wiltshire is 63%, compared to 74% in Swindon.

The extent that strategies can promote a balance between residential and employment development will, in part, depend on the existing provision in terms of housing stock and employment uses, the relationship between them, and the relationship/connectivity of a settlement with other parts of the HMA/FEMA (which themselves are strongly influenced by travel to work areas) and adjacent areas. The provision of employment development in isolation could, for example, be more likely to lead to an increase in travel distances but not necessarily if it was located in an area of relatively higher rates of unemployment. The same might apply in areas where employment vacancies are high, or jobs are expected to increase. This will, however, depend on the extent that the skills base of the unemployed in the local area match that provided by any new employers.

Of the total need of 182ha of employment land identified in the FEMA, a substantial proportion can be met from existing operational employment sites and site allocations leaving 26ha to be met from additional allocations across the county. Due to the extent of existing employment provision, none of the three strategies would be likely to result in major positive or negative effects, as the vast majority is already being met by current employment sites or existing commitments.

Employment allocations are often subject to speculative housing applications and therefore at risk of loss during the plan period.

At **Trowbridge** total employment has steadily declined since 2009. There is a high concentration of jobs in public administration & defence. A lack of employment development is highlighted in the JSF profile. Recent investments include the St Stephen's Place leisure/food/retail developments, the new HQ offices for Hitachi CVS, and Apetito's programme at Canal Road. White Horse Business Park is again nearing full occupancy, with only one undeveloped plot. The Functional Economic Market Area Assessment states that there is a net additional sq m floor space requirement of approx. 30,000m² for (A1), 980 (A2) and 9,200m² (A3-5) within the A350 FEMA for 2016-36. The study anticipates this growth is accommodated primarily at town centres. With Trowbridge the largest town centre, and a higher number of shop vacancies compared with other Wiltshire market towns, findings support a need for additional town centre comparison goods retail investment. There is a very limited supply of employment sites and premises available in Trowbridge to accommodate economic growth potential.

At **Bradford on Avon** the total number of jobs jumped significantly in 2014-15, having previously stagnated. There is a high concentration of jobs in accommodation & food services, as reflected in the JSF. 2017 saw the construction of a new HQ and production facility for R&D-led automotive business Anthony Best Dynamics as part of the Kingston Farm mixed-use development. There is a low level of unemployment at the town. There are currently limited alternative employment sites available for businesses to locate or existing businesses to expand.

At **Westbury** total employment has stagnated since 2009. There is a high concentration of jobs in transportation & storage, and noticeable concentrations in Manufacturing and Construction. Welton Bibby & Baron have invested significantly at their WWTE site following relocation to the area. There has been significant investment into Hawke Ridge Business Park, located next to the A350 between Westbury and Trowbridge. There is a low level of unemployment at the town.

At **Warminster**, total employment has stagnated since 2009. There is a noticeable concentration of jobs in Education, Health & Social Work, and Manufacturing. Planning permission to deliver several new business starter and industrial units was granted on Warminster Business Park last year, which would see the creation of over 40,000 sq ft of new B use space in the town. The town has low levels of unemployment but there is a very limited supply of employment sites and premises available in Warminster.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Under this strategy 1ha of additional employment land would be allocated at Bradford on Avon. The additional employment land available for new and expanding businesses is limited in scale but this would be consistent with constraints and the relatively low level of additional homes being proposed for the town. The affordability ratio for housing is high for BoA so the resultant effect would, to some extent, be dependent on the type of employment delivered i.e. whether the employees could afford to live near to where they work. The small amount of housing proposed will help to support local businesses, the town centre and provide an increased supply of local labour. Consequently, this strategy is predicted to result in a minor positive effect overall.	Under this strategy no additional employment land would be allocated at Bradford on Avon. Due to the small number of homes allocated to the town the effects of this strategy are unlikely to be negative. Overall this strategy is likely to result in minor positive effects at the town.	Under this strategy no additional employment land would be allocated at Bradford on Avon. Due to the small number of homes allocated to the town the effects are unlikely to be negative. The small amount of housing proposed will help to support local businesses, the town centre and provide an increased supply of local labour. Overall, this strategy is predicted to result in minor positive effects at the town. However, these benefits will be less than for TR-A and TR-B.
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor positive
Trowbridge	Under this strategy no additional employment land would be required at Trowbridge, the same as for TR-B and TR-C. Given the outstanding residual requirement of only 1ha across the HMA, the supply of outstanding and existing commitments is likely to be sufficient to balance the housing growth proposed against this strategy. This would, however, depend on existing commitments being retained and delivered. Given the significant amount of housing (5940 dwellings) proposed under this strategy, however, this	Under this strategy no additional employment land would be required at Trowbridge, the same as for TR-A and TR-C. Given the outstanding residual requirement of only 1ha across the HMA, the supply of outstanding and existing commitments is likely to be sufficient to balance the housing growth proposed against this strategy. This would, however, depend on existing commitments being retained and delivered. Given the significant amount of housing (4920 dwellings) proposed under this strategy, however, this will help	Under this strategy no additional employment land would be required at Trowbridge, the same as for TR-A and TR-C. Given the outstanding residual requirement of only 1ha across the HMA, the supply of outstanding and existing commitments is likely to be sufficient to balance the housing growth proposed against this strategy. This would, however, depend on existing commitments being retained and delivered. Given the significant amount of housing (5585 dwellings) proposed under this strategy, however, this will help

	will help significantly to support local businesses, the town centre, retail and employment parks around the town and provide a significantly increased supply of local labour. Overall, moderate positive effects are considered likely. However, benefits would be more if employment land was also proposed to help balance the housing growth.	significantly to support local businesses, the town centre, retail and employment parks around the town and provide a significantly increased supply of local labour. Overall, moderate positive effects are considered likely. However, benefits would be more if employment land was also proposed to help balance the housing growth.	significantly to support local businesses, the town centre, retail and employment parks around the town and provide a significantly increased supply of local labour. Overall, moderate positive effects are considered likely. However, benefits would be more if employment land was also proposed to help balance the housing growth.
	Likely effects: moderate positive	Likely effects: moderate positive	Likely effects: moderate positive
Warminster	At Warminster no additional employment land would be allocated at the town. However, it is assumed that existing commitments would be broadly sufficient to provide balanced growth for the town. The relatively small amount of housing under this strategy, the same as TR-C, will help to support local businesses, the town centre and provide an increased supply of local labour. Providing that existing commitments are delivered for employment uses, this strategy would be likely to have minor positive effects overall.	At Warminster no additional employment land would be allocated at the town. However, it is assumed that existing commitments would be broadly sufficient to provide balanced growth for the town. The relatively small amount of housing under this strategy, although slightly higher than TR-A and TR-C, will help to support local businesses, the town centre and provide an increased supply of local labour. Providing that existing commitments are delivered for employment uses, this strategy would be likely to have minor positive effects overall.	At Warminster no additional employment land would be allocated at the town. However, it is assumed that existing commitments would be broadly sufficient to provide balanced growth for the town. The relatively small amount of housing under this strategy, the same as TR-A, will help to support local businesses, the town centre and provide an increased supply of local labour. Providing that existing commitments are delivered for employment uses, this strategy would be likely to have minor positive effects overall.
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor positive
Westbury	Under this strategy there would be no additional employment land allocated at Westbury. Whilst there is a relatively low residual need for homes to be delivered over the same period, it is therefore assumed (from the FEMA evidence) that existing commitments would be broadly sufficient to meet local employment needs for Westbury. The relatively low level of housing under this strategy will still help to support local businesses, the town centre and provide an increased supply of local labour. It is predicted that the strategy would have minor positive effects for the town.	Under this strategy there would be 1ha additional employment land allocated at Westbury but also a higher level of housing compared to Strategies TR-A and TR-C. Although this represents the largest allocation of employment of the three strategies it is relatively small scale for a town the size of Westbury. However, there would also be a significantly higher number of homes delivered under this strategy. Overall, moderate positive effects are considered likely against this objective.	Under this strategy there would be no additional employment land allocated at Westbury. Whilst there is a relatively low residual need for homes to be delivered over the same period, it is therefore assumed (from the FEMA evidence) that existing commitments would be broadly sufficient to meet local employment needs for Westbury. The relatively low level of housing under this strategy, which is a slight increase over TR-A, will still help to support local businesses, the town centre and provide an increased supply of local labour. It is predicted that this strategy would have minor positive effects for the town.
	Likely effects: minor positive	Likely effects: moderate positive	Likely effects: minor positive
Rest of HMA	Under this strategy no employment land would be allocated for the rest of the HMA. This would mean a continuation of the existing approach to the provision of employment land to meet local needs in rural areas.	Under this strategy no employment land would be allocated for the rest of the HMA. This would mean a continuation of the existing approach to the provision of employment land to meet local needs in rural areas.	Under this strategy 1ha of employment land would be allocated for the rest of the HMA. This would mean an increase in the existing provision of employment land to balance the allocation of significantly higher additional homes under this strategy.

	The relatively low level of housing under this strategy will still help to support local businesses, the town centre and provide an increased supply of local labour. It is predicted that this strategy would have minor positive effects overall.	The relatively low level of housing under this strategy will still help to support local businesses, the town centre and provide an increased supply of local labour. It is predicted that this strategy would have minor positive effects overall.	However, given that the benefits of this increased growth will be spread out across a wide rural area, benefits are not expected to be significant and this strategy is also likely to have minor positive effects.
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor positive
Overall HMA score	1.2 Overall, taking into account the assessment across all settlements/areas, minor positive effects are considered likely for this strategy.	1.4 Overall, taking into account the assessment across all settlements/areas, minor positive effects are considered likely for this strategy.	1.2 Overall, taking into account the assessment across all settlements/areas, minor positive effects are considered likely for this strategy.

Conclusions and Recommendations:

- Although all strategies are likely to have minor positive effects overall, **Strategy TR-B is considered the most sustainable option** as it is likely to have greater benefits across all areas. This is as a result of this strategy proposing significant amounts of growth at both Trowbridge and Westbury which is likely to have significant benefits against this objective.
- Overall, **Strategies TR-A and TR-C score equally and are the joint least sustainable strategies** as they are likely to have less benefits across all areas. In these two strategies, significant benefits are only likely at Trowbridge and at no other settlement or area.
- Outstanding commitments in the Trowbridge HMA are capable of meeting a significant proportion of the need for additional employment land to 2036. Consequently, the differences in the effects of the three strategic options for the distribution of the employment land requirement are limited by the relatively small scale of development (1ha) under consideration.
- Strategy TR-A directs the employment requirement to where it would be more likely to have a positive effect, i.e. the smaller settlement of Bradford on Avon. However, with only 1ha employment and 520 new dwellings, this is not likely to have significant benefits for the local economy.
- Given the amount of housing allocated to Trowbridge under all strategies, significant benefits are considered likely for all strategies, despite no allocation of employment land. This is because the significant level of housing will help to support local businesses, the town centre, retail and employment parks and provide an increased supply of local labour.
- The only other strategy considered likely to have significant benefits at a particular place is TR-B for Westbury which makes some employment provision and a significant increase in the level of housing.
- With regards Bradford on Avon, Warminster and Rest of the HMA, none of the strategies are likely to have significant benefits in these areas. There would need to be a significant increase in both housing and employment provision for their local economies to be significantly benefitted.
- Settlements/areas that combine a higher level of both employment and housing are considered likely to give greater benefits against this objective as both elements help to improve self-containment of settlements and encourage vibrant and diversified places.
- Retention of existing and allocated employment land is often challenging to manage. Consider inclusion of policies that safeguard against incompatible uses or unnecessary loss of employment sites but also set out criteria against which, in exceptional cases, an existing site or allocation that is clearly and demonstrably no longer suitable for employment development can be de-allocated or developed for an alternative use.

- Although there is limited requirement for employment land, it is possible that site allocations for the HMA may be suitable for mixed use development that could result in more than 1ha of additional employment land being identified. Whilst this would increase the options available for businesses looking to expand or relocate in Wiltshire, it could also lead to unintended loss or non-delivery of sustainable employment land elsewhere. This will need to be monitored and taken into consideration during plan preparation.

SA Annex 1.4 - Trowbridge Housing Market Area (HMA) - SA of Alternative Development Strategies (Local Housing Needs Assessment)

- **Strategy TR – A (Current Strategy)** – rolling forward the Core Strategy.
- **Strategy TR – B (Westbury Growth Point)** – housing led by growth forecast at Westbury (from 1,435 to 2,130 homes), growth at Core Strategy rates at Warminster (no change) and Bradford on Avon assessed needs i.e. -4%. Consequential reductions at Trowbridge but still main focus for growth (5,400).
- **Strategy TR – C (Greater Rural Focus)** - Rest of HMA aligned to past rates of housing (from 635 to 1,200 homes). Warminster reflects assessed needs i.e. -4% and Westbury continues at Core Strategy rates. Reduced at Trowbridge (6,130) and Bradford on Avon (300).

Proposed distribution of housing and employment requirements – Local Housing Needs Assessment - Trowbridge HMA						
Settlement	Strategy TR – A (Current Strategy)		Strategy TR – B (Westbury Growth Point)		Strategy TR – C (Greater Rural Focus)	
	Housing	Employment	Housing	Employment	Housing	Employment
Bradford on Avon	570	1	570	0	300	0
Trowbridge	6520	0	5400	0	6130	0
Warminster	1840	0	1950	0	1840	0
Westbury	1435	0	2130	1	1530	0
Rest of HMA	635	0	950	0	1200	1
TOTAL	11000	1	11000	1	11000	1

Sustainability Appraisal Objective 1: Protect and enhance all biodiversity and geological features and avoid irreversible losses.

Decision-Aiding Question (DAQ) 1: Avoid potential negative impacts of development on designated wildlife sites, protected species and priority species and habitats (international, national, local) and enhance these where possible?

Bradford on Avon is located within the Consultation Zone of the Bath and Bradford on Avon Special Area of Conservation (SAC) providing key habitat for hibernation, breeding, foraging and commuting bats for Annex II bat species. Activities which occur in these designated sites and even some distance from them may damage important elements of the network and disrupt population dynamics. There is one SSSI in the area (Gripwood Quarry) and several County Wildlife Sites (CWS) within close proximity to the town

The landscape surrounding **Trowbridge** is known to be of high importance for bats, supporting at least 14 of the 18 UK bat species. Trowbridge is located within the Consultation Zone of the Bath and Bradford on Avon Special Area of Conservation (SAC) providing key habitat for Annex II species, particularly Bechstein's. In particular, woodlands to the east and southeast of Trowbridge (Biss Wood, Green Lane Wood and Clanger and Picket Wood) are known to support a large and internationally-significant breeding meta-population of Bechstein's bat. Picket and Clanger Wood is the only designated SSSI in close proximity to the town. There are four County Wildlife Sites, including Bliss Wood, Flowers Wood, East Flowers Wood, Green Lane Wood and Meadow and Smith's Well Wood, Kettle Lane Wood, and Wiildbrook Wood and Biss Meadows Country Park.

The town of **Westbury** is also located within the Consultation Zone of the Bath and Bradford on Avon Special Area of Conservation (SAC) providing key habitat. It is within 1.3km of the Salisbury Plain SAC, SPA. The town is within the visitor catchment of the Salisbury Plain SPA. There are three SSSI within close proximity to Westbury, including Salisbury Plain SSSI, Bratton Downs SSSI and Upton Cow Down SSSI. There are 12 County Wildlife Sites located within the vicinity of the town (Westbury Lakes, White Scar Hanging, White Scar Hanging Chalk, Chalcot Wood, Farmers Hill, Black Dog Woods North, Fairwood House Marsh, Fairwood Road Railway Line, Round Wood, Brokerswood and Hazel Wood, Bratton Chalk and Bratton down Quarry). In **Warminster**, phosphates in relation to the River Avon SAC, which is also a main contributor to habitat connectivity, have been identified as a potential issue relating to increased growth in the settlement. Furthermore, the Bath and Bradford on Avon SAC buffer lies to the immediate north of the settlement and Salisbury Plain to the east and south. Some areas around Warminster lie within the visitor catchment of the Salisbury Plain SPA and are therefore at risk of recreation pressure.

Some areas in the **Rest of the HMA** are designated as SSSIs, lie within the buffer zones of SACs and SPAs, or contain important habitats including ancient woodland.

DAQ 2: Ensure that all new developments protect Local Geological Sites (LGSs) from development?

Westbury is the only settlement in the Trowbridge HMA in proximity to an LGS (formerly Regional Sites of Geological Importance, or RIG) with sites lying on the eastern side of the settlement towards Bratton and Edington.

DAQ 3: Aid in the delivery of a network of multifunctional Green Infrastructure?

The design of developments may incorporate measures to enhance biodiversity and contribute to networks of multifunctional green space known as green infrastructure. The preparation of a Green Infrastructure (GI) Strategy will help to provide a long-term vision and strategic framework to aid the delivery of GI. However, at this stage of the process, it is not possible to comment on the likelihood of GI being adopted as part of development.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	The degree of ecological sensitivity in Bradford on Avon, with the whole of the settlement lying within the core sustenance zone of the Bath and Bradford on Avon Bats SAC, would make accommodating this level of additional housing and employment challenging.	This proposes a level of growth similar to TR-A. The degree of ecological sensitivity in Bradford on Avon, with the whole of the settlement lying within the core sustenance zone of the Bath and Bradford on Avon Bats SAC, would make accommodating this level of additional housing and employment challenging.	This strategy proposes a level of growth almost half that of TR-A and TR-B. It is considered that this may be able to be accommodated on a specific site(s) within the town without significant adverse effects, given careful site selection and mitigation. Overall, minor adverse effects are considered likely given this lower level of growth.

	Development could also have some localised impacts on habitats in the short-term. Overall, moderate adverse effects are considered likely.	Development could also have some localised impacts on habitats in the short-term. Overall, moderate adverse effects are considered likely.	
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Trowbridge	All levels of growth proposed under all strategies are significant and have the potential to lead to significant adverse effects which could be problematic to mitigate. The key issue is that Trowbridge is in close proximity to the Bath and Bradford on Avon Bats SAC, and additional growth is likely to lead to recreational and possible direct impacts on nearby woodland habitats and Annex II bat species. Development could also have some localised impacts on different habitats in the short-term. Overall, moderate adverse effects are likely.	All levels of growth proposed under all strategies are significant and have the potential to lead to significant adverse effects which could be problematic to mitigate. The key issue is that Trowbridge is in close proximity to the Bath and Bradford on Avon Bats SAC, and additional growth is likely to lead to recreational and possible direct impacts on nearby woodland habitats and Annex II bat species. Development could also have some localised impacts on different habitats in the short-term. Overall, moderate adverse effects are likely.	All levels of growth proposed under all strategies are significant and have the potential to lead to significant adverse effects which could be problematic to mitigate. The key issue is that Trowbridge is in close proximity to the Bath and Bradford on Avon Bats SAC, and additional growth is likely to lead to recreational and possible direct impacts on nearby woodland habitats and Annex II bat species. Development could also have some localised impacts on different habitats in the short-term. Overall, moderate adverse effects are likely.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	All strategies propose a similar level of relatively high growth at Warminster. Given the proximity of the Salisbury Plain SAC/SPA and Bath and Bradford on Avon Bats SAC, and potential adverse cumulative impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage, significant adverse effects are likely for all strategies. For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which is defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.	All strategies propose a similar level of relatively high growth at Warminster. Given the proximity of the Salisbury Plain SAC/SPA and Bath and Bradford on Avon Bats SAC, and potential adverse cumulative impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage, significant adverse effects are likely for all strategies. For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which is defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.	All strategies propose a similar level of relatively high growth at Warminster. Given the proximity of the Salisbury Plain SAC/SPA and Bath and Bradford on Avon Bats SAC, and potential adverse cumulative impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage, significant adverse effects are likely for all strategies. For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which is defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Westbury	This strategy proposes the lowest quantum growth for Westbury. Westbury is relatively unconstrained with regards to ecological statutory designations. The key issue is the south of Westbury is within the visitor catchment of the Salisbury Plain SPA, therefore development	This strategy proposes a significantly higher quantum of growth for Westbury. Westbury is relatively unconstrained with regards to ecological statutory designations. The key issue is the south of Westbury is within the visitor catchment of the Salisbury Plain SPA, therefore development could lead to additional recreational pressures. This additional growth	This strategy proposes a similar quantum of growth to TR-A. Westbury is relatively unconstrained with regards to ecological statutory designations. The key issue is the south of Westbury is within the visitor catchment of the Salisbury Plain SPA, therefore development could lead to

	could lead to additional recreational pressures. Development could also have some localised impacts on other habitats in the short-term. Overall, this lower level of growth is likely to have minor adverse ecological effects, depending on the proximity of development to sensitive areas.	could also lead to development in parts of the town that will adversely affect Annex II bat species in relation to the Bath and Bradford on Avon Bats SAC in the north. Development could also have some localised impacts on other habitats in the short-term. Overall, this higher level of growth is likely to have moderate adverse ecological effects, depending on the proximity of development to sensitive areas.	additional recreational pressures. Development could also have some localised impacts on other habitats in the short-term. Overall, this lower level of growth is likely to have minor adverse ecological effects, depending on the proximity of development to sensitive areas.
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	The Rest of the HMA covers a wide geographical area. It may be possible for development to avoid significant adverse effects, particularly at this lower level of growth. Since at this stage, no sites have been identified, minor adverse effects on this objective are considered likely.	The Rest of the HMA covers a wide geographical area. It may be possible for development to avoid significant adverse effects with median level of growth. This will depend on the location and type of sites allocated. Since at this stage, no sites have been identified, minor adverse effects on this objective are considered likely.	The Rest of the HMA covers a wide geographical area. It may be possible for development to avoid significant adverse effects with this higher level of growth, but impacts are likely to be greater than TR-A and TR-B. This will depend on the location and type of sites allocated. Since at this stage, no sites have been identified, minor adverse effects on this objective are considered likely.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Overall HMA score	-1.6 Overall, considering the assessment of all settlements/areas, this strategy is likely to have moderate adverse effects on this objective.	-1.8 Overall, considering the assessment of all settlements/areas, this strategy is likely to have moderate adverse effects on this objective.	-1.4 Overall, considering the assessment of all settlements/areas, this strategy is likely to have minor adverse effects on this objective

Conclusions/Recommendations:

- **Strategy TR-C is considered the most sustainable strategy** against this objective as the number of likely adverse effects is fewer.
- **Strategy TR-B is considered the least sustainable strategy** due to a greater number of likely significant adverse effects, specifically at Bradford on Avon, Trowbridge, Warminster and Westbury.
- Biodiversity issues in the Trowbridge HMA are mainly focussed on protecting Annex II bat species due to the internationally designated Bath and Bradford on Avon Bats SAC, impacts on the River Avon SAC at Warminster and the proximity of the Salisbury Plain SAC/SPA to Westbury and Warminster.
- Strategies that propose higher levels of growth at Bradford on Avon (TR-A and TR-B) are considered likely to have significant adverse effects which would be difficult to mitigate, as are all strategies for Warminster and Trowbridge.
- **Recommendation - It is recommended that levels of growth are reduced at Bradford on Avon, Warminster and Trowbridge with growth focussed instead on Westbury and other settlements within the Rest of the HMA and that this could be considered as a new strategy that would reduce significant effects against this objective.**
- Westbury is considered the least constrained of the four settlements in terms of biodiversity and for this reason is considered better able to accommodate a higher level of growth.

- Bradford on Avon is particularly sensitive for bats due to the settlement lying within the core sustenance zone of the internationally designated Bath and Bradford on Avon Bats SAC. Therefore, any additional growth - without appropriate mitigation - poses a risk to biodiversity. Strategy TR-C is considered the most sustainable strategy as it proposes a much lower amount of growth at the town. However, adoption of proposed recommendations could mitigate adverse effects.
- Growth at Trowbridge poses a risk to the habitats of the Annex II bat species associated with the Bath and Bradford on Avon Bats SAC, particularly due to recreation impacts on nearby woodlands. While Trowbridge is less constrained than Bradford on Avon with regards to the Bath and Bradford on Avon Bats SAC, levels of growth at the settlement proposed across all strategies are high. Therefore, moderate adverse effects for Trowbridge are also likely across all scenarios. However, adoption of proposed recommendations, including the adoption of the Trowbridge Bat Mitigation Strategy, could mitigate some of the adverse effects.
- Development across the board should avoid areas of biodiversity sensitivity where possible, particularly important bat habitats such as woodland. Offsetting and habitat creation are likely to be key to enabling any further development where growth poses a risk to bat habitats, particularly in Trowbridge and Bradford on Avon. The adoption of the Trowbridge Bat Mitigation Strategy will help to ensure that additional development in the settlement prevents adverse effects. Development should also take the opportunity to improve habitats for bats where necessary, through the creation of woodland blocks and planting of hedgerows and tree lines which would improve habitat connectivity and buffer the effects of increased development.
- With regards to impacts on the River Avon SAC, particularly an issue in Warminster, a Memorandum of Understanding with relevant authorities has been agreed to ensure that development does not have negative effects upon the SAC. Ensuring the MoU remains up to date will be important to protecting the biodiversity in the SAC.
- Recreational impacts on the Salisbury Plain could be avoided by adopting an up-to-date Salisbury Plain Mitigation Strategy.

Sustainability Appraisal Objective 2: Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings

Decision-Aiding Question (DAQ) 1: Ensure efficient use of land?

The design of specific developments will involve setting appropriate housing densities for development which will be part of the planning process. The assessment of efficient use of land will be carried out in a more detailed way at the individual site assessment stage within the SA.

DAQ 2: Lead to the reuse of Previously Developed Land where possible/appropriate?

There is a lack of previously developed land (PDL) across the HMA. Therefore, all strategies are likely to result in the loss of greenfield land.

DAQ 3: Encourage remediation of contaminated land? If so, would this lead to issues of viability and deliverability?

Across Wiltshire, some 14,000 sites of potential contamination exist as a result of a range of historical land uses; 225 high priority sites have been identified as part of a prioritised approach to inspection.

Currently, four sites have been determined as contaminated land and remediated. The remediation of contaminated land will be principally addressed through the planning process where former sites change their use.

DAQ 4: Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)?

While there is some Grade 2 (very good) land to the north of **Bradford on Avon**, the majority of agricultural land surrounding the urban area is Grade 3 (good to moderate), with some Grade 4 (poor) land to the west.

In **Trowbridge**, the majority of agricultural land bordering the urban area is Grade 3 with some Grade 4 and a small area of Grade 2 in the north east.

While there are areas of Grade 4 and Grade 3 land surrounding **Westbury**, the south and south east of the town is surrounded by Grade 2 land.

The urban area of **Warminster** is surrounded by Grade 2 agricultural land to the east and west, although there are some areas of Grade 3 to the north and south and a small amount of Grade 4 to the south.

Excluding the urban areas, the majority of the **Rest of the HMA** is classified as being Grade 3 agricultural land, with large patches of Grade 4 land occurring in the centre of the HMA. However, the south of the HMA around Warminster and the south of Westbury has large areas of Grade 2 land.

DAQ 5: Lead to the sterilisation of viable mineral resources? If so, is there potential to extract the mineral resource as part of the development?

The majority of **Bradford on Avon** lies within a Mineral Safeguarding Area (MSA).

The east of **Westbury** lies within a Mineral Safeguarding Area.

In the **Rest of the HMA** there are MSAs, particularly around Bradford on Avon and the east of Westbury.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Despite this strategy proposing a low level of growth proportional to Bradford on Avon, the settlement lies within an MSA. Therefore, further assessment will be needed on the potential impacts on mineral resources. Furthermore, while it is anticipated that Best and Most Versatile (BMV) land could be avoided, Bradford on Avon has a very limited capacity for PDL, so development is likely to be on greenfield land. As a result, a minor adverse effect is considered likely.	Despite this strategy proposing a low level of growth proportional to Bradford on Avon, the settlement lies within an MSA. Therefore, further assessment will be needed on the potential impacts on mineral resources. While it is anticipated that BMV land could be avoided, Bradford on Avon has a very limited capacity for PDL, so development is likely to be on greenfield land. As a result, a minor adverse effect is considered likely.	Despite this strategy proposing a low level of growth proportional to Bradford on Avon, the settlement lies within an MSA. Therefore, further assessment will be needed on the potential impacts on mineral resources. Furthermore, while it is anticipated that BMV land could be avoided, Bradford on Avon has a very limited capacity for PDL, so development is likely to be on greenfield land. As a result, a minor adverse effect is considered likely. Adverse effects are considered to be less than for TR-A and TR-B given the lower quantum of growth to be directed here.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Trowbridge	Despite the presence of some notable areas of PDL within the town, most of this growth is still likely to be on greenfield sites. Due to the high proportion of Grade 3 agricultural land bordering the urban area of Trowbridge, the potential impact is dependent on the precise location of growth and the outcome of further assessment on the proportion of Grade 3a land within Grade 3. Overall, moderate adverse effects are considered likely for all strategies at Trowbridge as the quantum of growth is significant. Impacts are likely to be greater under this strategy than the other strategies.	Despite the presence of some notable areas of PDL within the town, most of this growth is still likely to be on greenfield sites. Due to the high proportion of Grade 3 agricultural land bordering the urban area of Trowbridge, the potential impact is dependent on the precise location of growth and the outcome of further assessment on the proportion of Grade 3a land within Grade 3. Overall, moderate adverse effects are considered likely for all strategies at Trowbridge as the quantum of growth is significant. Impacts are likely to be less under this strategy than the other strategies.	Despite the presence of some notable areas of PDL within the town, most of this growth is still likely to be on greenfield sites. Due to the high proportion of Grade 3 agricultural land bordering the urban area of Trowbridge, the potential impact is dependent on the precise location of growth and the outcome of further assessment on the proportion of Grade 3a land within Grade 3. Overall, moderate adverse effects are considered likely for all strategies at Trowbridge as the quantum of growth is significant.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	While this strategy proposes a lower level of housing growth proportional to Warminster, the potential	While this strategy proposes a lower level of housing growth proportional to Warminster, the potential impacts	While this strategy proposes a lower level of housing growth proportional to Warminster, the potential impacts

	<p>impacts are dependent on the precise location of growth and the proportion of Grade 3a land within Grade 3.</p> <p>However, most of this growth is likely to be on greenfield sites as there are few areas of PDL within the town that can be developed.</p> <p>Overall, moderate adverse effects are considered likely for all strategies at Warminster as the quantum of growth is similar.</p>	<p>are dependent on the precise location of growth and the proportion of Grade 3a land within Grade 3.</p> <p>However, most of this growth is likely to be on greenfield sites as there are few areas of PDL within the town that can be developed.</p> <p>Overall, moderate adverse effects are considered likely for all strategies at Warminster as the quantum of growth is similar.</p>	<p>are dependent on the precise location of growth and the proportion of Grade 3a land within Grade 3.</p> <p>However, most of this growth is likely to be on greenfield sites as there are few areas of PDL within the town that can be developed.</p> <p>Overall, moderate adverse effects are considered likely for all strategies at Warminster as the quantum of growth is similar.</p>
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Westbury	<p>This strategy proposes a low level of proportional housing growth in Westbury. Therefore, while it is considered likely that the Best and Most Versatile (BMV) land could be avoided, the potential impacts are dependent on the precise location of growth, the proportion of Grade 3a within Grade 3, and the outcome of further assessment into the potential impacts associated with the MSA. However, as Westbury has a limited amount of PDL, additional development is likely to lead to the loss of greenfield land. As a result, minor adverse effects are considered likely.</p>	<p>This strategy proposes a significantly higher level of proportional growth at Westbury.</p> <p>While the scale of the potential impacts is dependent on the precise location of growth, the proportion of Grade 3a within Grade 3, and the outcome of further assessment into the potential impacts associated with the MSA, Westbury has a limited amount of PDL so additional development is likely to lead to the loss of greenfield land. As a result, moderate adverse effects are anticipated.</p> <p>Furthermore, as this strategy proposes the highest level of comparative growth for Westbury, the risk of adverse effects occurring is greater compared to the other strategies.</p>	<p>This strategy proposes a low level of proportional housing growth in Westbury. Therefore, the potential impacts are dependent on the precise location of growth, the proportion of Grade 3a within Grade 3, and the outcome of further assessment into the potential impacts associated with the MSA. However, as Westbury has a limited amount of PDL, additional development is likely to lead to the loss of greenfield land. As a result, minor adverse effects are anticipated. As this strategy proposes, a similar but higher level of growth than TR-A, a similar effect is likely.</p>
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	<p>In the Rest of the HMA, it is possible for development to avoid areas of BMV land. However, as the majority of the Rest of the HMA is classified as Grade 3 land, further assessment would be needed to distinguish the areas of Grade 3a and Grade 3b to understand the extent of BMV land. Regardless, due to the likely loss of greenfield land, minor adverse effects are likely.</p>	<p>In the Rest of the HMA, it is possible for development to avoid areas of BMV land. However, as the majority of the Rest of the HMA is classified as Grade 3 land, further assessment would be needed to distinguish the areas of Grade 3a and Grade 3b to understand the extent of BMV land. Regardless, due to the likely loss of greenfield land, minor adverse effects are likely. This strategy proposes a higher level of growth than rolling forward the current strategy and so a larger effect is considered likely.</p>	<p>In the Rest of the HMA, it is possible for development to avoid areas of BMV land. However, as the majority of the Rest of the HMA is classified as Grade 3 land, further assessment would be needed to distinguish the areas of Grade 3a and Grade 3b to understand the extent of BMV land.</p> <p>As this strategy proposes a significantly higher amount of development than TR-A and TR-B, the likelihood of adverse effects on this objective is higher and moderate adverse effects are likely.</p>
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Overall HMA score	<p>-1.4 Minor adverse</p> <p>At this stage no sites have been allocated which makes it difficult to advise how a particular development strategy will affect this objective. While there may be developable areas in each settlement which are able to</p>	<p>-1.6 Moderate adverse</p> <p>At this stage no sites have been allocated which makes it difficult to advise how a particular development strategy will affect this objective. While there may be developable areas in each settlement which are able to avoid BMV</p>	<p>-1.6 Moderate adverse</p> <p>At this stage no sites have been allocated which makes it difficult to advise how a particular development strategy will affect this objective. While there may be developable areas in each settlement which are able to avoid BMV</p>

	avoid BMV land, overall, there are likely to be minor adverse effects on SA objective 2 due to the loss of greenfield land.	land, overall, there are likely to be moderate adverse effects on SA objective 2 due to the loss of greenfield land.	land, overall, there are likely to be moderate adverse effects on SA objective 2 due to the loss of greenfield land.
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Conclusions/Recommendations:

- **Strategy TR-A is considered the most sustainable strategy** as there are likely to be fewer adverse effects against this objective. This is because of the lower quantum of growth proposed for Bradford on Avon, Westbury and the Rest of the HMA with consequent less significant impacts.
- **Strategies TR-B and TR-C score equally and are considered less sustainable strategies** against this objective as there are likely to be greater adverse effects against this objective.
- It is considered that all strategies for Trowbridge and Warminster are likely to have significant adverse effects against this objective as a significantly higher quantum of growth is directed to each settlement and it is likely that much of this will need to take place on greenfield sites on the edge of the towns, given the relative lack of PDL opportunities.
- The majority of the HMA is Grade 3 land. Therefore, in order to identify which areas are more suitable for development and less likely to lead to adverse effects, further assessment is likely to be needed to distinguish between Grade 3a land and Grade 3b land to determine the extent of Best and Most Versatile (BMV) agricultural land.
- In particular, Warminster has a high proportion of known BMV land (Grade 1 and Grade 2) surrounding the settlement, Westbury has a large amount of known BMV land to the south as well as Mineral Safeguarding Areas (MSAs) to the east, and Bradford on Avon lies within an MSA.
- All strategies are likely to have adverse effects as it is likely that most new development will be built on greenfield sites. This may or may not involve Best and Most Versatile (BMV) agricultural land (Grade 1, 2 and 3a).
- There is a lack of previously developed land (PDL) across the HMA. Therefore, all strategies are likely to result in the loss of greenfield land and will potentially lead to the loss of BMV. However, without knowing the exact location of growth and the extent of what BMV land is required, it is anticipated that negative impacts will occur in all strategies.
- Uncertainties also exist regarding the potential for adverse impacts on mineral resources and the potential for contaminating remediating land.
- Where possible, to reduce effects on this objective, new development should be located where loss of BMV can be minimised, PDL maximised where it exists, and development built at the highest densities relevant to the location. Development should also encourage the remediation of contaminated land where feasible.
- Further assessment will also need to be carried out to understand the potential impacts of development on Mineral Safeguarding Areas (MSAs) when allocating precise locations for growth.

Sustainability Appraisal Objective 3: Use and manage water resources in a sustainable manner.

Decision-Aiding Question (DAQ) 1: Protect surface, ground and drinking water quality?

Trowbridge does not have any Source Protection Zones which would be affected by development, however, there is a Drinking Water Protected Area (Surface Area) surrounding the north of the town.

Bradford on Avon and the surrounding area lies within a Drinking Water Protected Area (Surface Water), and a Groundwater Source Protection Zone 2 (Outer Protection Zone) lies less than half a mile to the north of the settlement.

Any development which takes place to the south of **Westbury** would have to be cognisant of groundwater pollution as there are Source Protection Zones 1 and 2 (Inner and Outer Protection Zones) in the vicinity.

Source Protection Zones cover the north of **Warminster**, being mainly Zone 2 (Outer Protection) or Zone 3 (Total Catchment) with some smaller areas of Zone 1 (Inner Protection Zone).

While there are rural areas in the **Rest of the HMA** which are within Source Protection Zones or Drinking Water Protected Areas, there are also plenty of areas in the countryside where development could occur without posing a risk to water resources.

DAQ 2: Direct development to sites where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?

While Wessex Water have stated that infrastructure investment in **Trowbridge** is committed for 2019/20 with regards to phosphate reduction and additional capacity, at the time there are no plans for further investment. There is a moderate probability that rolling forward the current strategy would require construction works.

Bradford on Avon does not have any infrastructure investment scheduled, although Wessex Water have advised that assets are predicted to require investment to improve capacity between 2025 – 2036. There is a moderate probability that rolling forward the current strategy would require construction works.

Wessex Water have stated that infrastructure investment in **Westbury** is committed in 2019/20 and that further investment is likely to be required to improve capacity between 2025 – 2036. There is no probability that rolling forward the current strategy would require construction works to accommodate development.

In **Warminster**, Wessex Water have stated that investment is committed for 2020/21 and that further investment is likely to be required to improve capacity between 2025 and 2036. There is a moderate probability that rolling forward the core strategy would require construction works to accommodate development.

Rural development in the **Rest of the HMA** is likely to be more dispersed which may mean that the existing drainage infrastructure can accommodate the additional capacity. However, there may be a cumulative effect on the rural system. Furthermore, if the rural development is not dispersed it could lead to requirements to upgrade capacity outside of the main settlements which has not yet been accounted for.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	While this strategy proposes a low level of housing growth proportional to Bradford on Avon, further development should consider the risk to groundwater and drinking water resources as well as any strain on the capacity of the water network due to a potential requirement for investment. Minor adverse effects are considered likely given low level of growth.	While this strategy proposes a low level of housing growth proportional to Bradford on Avon, the same as for TR-A, further development should consider the risk to groundwater and drinking water resources as well as any strain on the capacity of the water network due to a potential requirement for investment. Minor adverse effects are considered likely given low level of growth.	At Bradford on Avon, further development should consider the risk to groundwater and drinking water resources as well as any strain on the capacity of the water network due to a potential requirement for investment. As a result, a minor adverse effect is anticipated. However, this strategy proposes a very low level of housing growth proportional to the settlement and the lowest level of comparative housing growth in Bradford on Avon. Therefore, any negative effects are more likely to be avoided or successfully mitigated compared to the other strategies.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse

Trowbridge	As this strategy proposes the highest level of housing growth at Trowbridge, the scale of growth proposed in this strategy may impact on this objective due to a potential need for future investment in the water network and the potential impact on drinking water resources. Moderate adverse effects are considered likely.	Despite this strategy proposing the lowest level of growth at Trowbridge, it is still significant and a potential need for future investment in the water network and the potential risk on drinking water resources means that moderate adverse effects are likely. However, as this strategy proposes the lowest level of comparative housing growth, the risk of negative effects occurring is lower when compared to TR-A.	As this strategy proposes a medium level of housing growth proportional to Trowbridge, the scale of growth proposed in this strategy may impact on this objective due to a potential need for future investment in the water network and the potential risk on drinking water resources. As a result, moderate adverse effects are considered likely.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	All three strategies propose a similar level of significant growth at Warminster with effects against this objective likely to be similar. The risk of impacts on groundwater resources along with a potential need for investment to improve the capacity of the water network suggest that moderate adverse effects are likely.	All three strategies propose a similar level of significant growth at Warminster with effects against this objective likely to be similar. The risk of impacts on groundwater resources along with a potential need for investment to improve the capacity of the water network suggest that moderate adverse effects are likely.	All three strategies propose a similar level of significant growth at Warminster with effects against this objective likely to be similar. The risk of impacts on groundwater resources along with a potential need for investment to improve the capacity of the water network suggest that moderate adverse effects are likely.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Westbury	This strategy proposes a lower level of growth at Westbury. The risk to the Source Protection Zones to the south and the requirement for investment in the water network mean that minor adverse effects are considered likely. There is no probability that rolling forward the current strategy would require construction works to accommodate development.	As this strategy proposes a significantly higher level of growth at Westbury, the risk to the Source Protection Zones to the south and the potential requirement for investment in the water network is higher in this strategy compared to the other strategies. Overall, moderate adverse effects are considered likely. As this strategy proposes a higher level of housing, it is likely that it would lead to an increased effect when compared to the roll forward.	Despite this strategy proposing a lower level of growth proportional to Westbury, the risk to the Source Protection Zones to the south and the potential requirement for investment in the water network mean that minor adverse effects are considered likely. This strategy proposes a slightly higher level of growth than the roll forward and is therefore likely to lead to slightly greater adverse effects.
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	There are areas in the countryside where development could occur without posing a risk to water resources. However, it could lead to requirements to upgrade capacity outside of the main settlements which has not yet been accounted for. This level of growth is considered likely to have minor adverse effects in the Rest of the HMA.	There are areas in the countryside where development could occur without posing a risk to water resources. However, it could lead to requirements to upgrade capacity outside of the main settlements which has not yet been accounted for. This level of growth is considered likely to have minor adverse effects in the Rest of the HMA. This strategy proposes a higher level of growth than the roll forward and would therefore be likely to lead to slightly greater effects.	There are areas in the countryside where development could occur without posing a risk to water resources. However, it could lead to requirements to upgrade capacity outside of the main settlements which has not yet been accounted for. This level of growth is considered likely to have minor adverse effects in the Rest of the HMA due to the potential impact on the rural drainage system and water protection zones. This strategy proposes a higher level of growth than the other two strategies and would therefore be likely to lead to greater effects.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse

Overall HMA score	-1.4 Minor adverse Due to uncertainties regarding the precise location of development and the potential for additional investment in infrastructure, it is difficult to assess the potential impact on water resources. Due to the presence of Drinking Water Safeguard Areas and Source Protection Zones and the potential for additional pressure on the water network, minor adverse effects on SA objective 3 are considered likely.	-1.6 Moderate adverse Due to uncertainties regarding the precise location of development and the potential for additional investment in infrastructure, it is difficult to assess the potential impact on water resources. Due to the presence of Drinking Water Safeguard Areas and Source Protection Zones and the potential for additional pressure on the water network, moderate adverse effects on SA objective 3 are considered likely.	-1.4 Minor adverse Due to uncertainties regarding the precise location of development and the potential for additional investment in infrastructure, it is difficult to assess the potential impact on water resources. Due to the presence of Drinking Water Safeguard Areas and Source Protection Zones and the potential for additional pressure on the water network, minor adverse effects on SA objective 3 are considered likely.
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Conclusions/Recommendations:

- Although the three strategies score similarly, strategies **TR-A and TR-C are more sustainable as there are less adverse effects likely**. This is primarily due to the likelihood of less adverse effects at Westbury due to lower levels of proposed growth in these strategies.
- **Strategy TR-B is considered the least sustainable strategy** as it is likely to have greater adverse effects than SW-A and SW-C. This is primarily due to the likelihood of greater adverse effects at Westbury due to significantly higher levels of proposed growth in this strategy.
- Due to the uncertainties regarding the impact on groundwater protection zones and the water network, likely adverse effects are considered likely across all settlements. There are areas in the HMA which lie within Source Protection Zones and Drinking Water Safeguard Areas which would need to be considered if development is allocated in that area. Furthermore, additional development beyond what is already planned for may require further investment in infrastructure, although until sites have been allocated it is difficult to know whether capacity issues will already have been addressed by planned improvements or whether further works will be required. Westbury has been identified as a settlement that would be unlikely to require construction works at the settlement to accommodate development.
- Given the scale of proposed growth at Trowbridge and Warminster, all strategies are considered likely to have moderate adverse effects which would be difficult to mitigate. However, mitigation is achievable, and the sustainability of any development will very much depend on its type and location, as well as any water efficiency measures installed.
- All strategies for Bradford on Avon and Rest of the HMA are considered likely to have minor adverse effects only. New development will require water infrastructure and will add to pressures on the water supply network, but significant effects are not thought likely.
- Warminster is the only settlement in the Trowbridge HMA where a Source Protection Zone (Zones 2 and 3) impinges on the built-up area itself. The Source Protection Zone also covers the entire north of the settlement and a Zone 3 designation surrounds Warminster to the east and west. Therefore, development in the settlement could struggle to avoid being located in a protection zone. Similarly, Bradford on Avon and the surrounding area lies within a Drinking Water Protected Area (Surface Water). However, although development should be aware of the requirement to protect groundwater and drinking water, it is unlikely to majorly affect housing development.
- With regards to investment in infrastructure, development in the rural area is most likely to require additional investment as Wessex Water's planned improvement works are focused on the towns. As a result, development in the Rest of the HMA poses a risk to ensuring capacity of the water network and will need further assessment to ensure capacity of the water network.
- To improve sustainability performance against this objective, development should avoid polluting groundwater and protect surface, ground and drinking water quality. It should be located in areas which have adequate water infrastructure and take account of the EA's approach to groundwater protection. Incorporation of SuDS will be important and the need for water can be reduced through water sensitive design, such as integrated water cycle management.

Sustainability Appraisal Objective 4: Improve air quality and minimise all sources of environmental pollution

Decision-Aiding Question (DAQ) 1: Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration?

At this high-level stage of appraisal, it is difficult to make notable distinctions between the options with relation to noise, light pollution, odour and vibration. Although, any level of development is expected to have a degree of effect, it is assumed that these matters would not necessarily be affected by the strategic distribution of housing and therefore no conclusions on this aspect of the strategic objective have been made at this stage.

Despite this, there is a risk that across the HMA and particularly within the Rest of the HMA, allocated growth may place development in locations where increases in pollutants such as noise and light may occur where this is not currently an issue.

DAQ 2: Minimise effects on and where possible improve air quality and locate sensitive development away from areas of poor air quality (such as AQMAs)?

Bradford on Avon has a long standing AQMA for annual average exceedance of nitrogen dioxide and small particulates (PM₁₀) with no improvement in the former. The data for fine particulate monitoring supports revocation of the AQMA in this respect. Bath Clean Air Zone may cause the displacement of traffic onto Wiltshire roads, but monitoring of potential traffic displacement onto Wiltshire Roads from Bath CAZ is agreed with Bath.

Westbury has a long standing AQMA. Historic real-time monitoring for NO₂, PM₁₀ and SO₂ and indicative real-time monitoring for particulates commenced in 2018. Other pollutants from nearby waste treatment works are present. Bath Clean Air Zone may cause the displacement of traffic onto Wiltshire roads, but monitoring of potential traffic displacement onto Wiltshire Roads from Bath CAZ is agreed with Bath.

Trowbridge is not subject to any AQMA declarations, two diffusion tubes to monitor were introduced in 2019 and the settlement is not considered at risk of an AQMA declaration.

Warminster is not subject to any AQMA declarations. A diffusion tube is apparent in Warminster and an additional tube is apparent in Heytesbury. The settlement is not considered at risk of an AQMA declaration.

Development in the **Rest of HMA** is unlikely to have a major effect on any existing AQMA. Due to the dispersed nature of facilities and the lack of public transport provision in these areas, development may lead to an increased number of journeys in the private car which could lead to increased pollutants from vehicles.

DAQ 3: Lie within a consultation risk zone for a major hazard site or hazardous installation?

Consultation risk zones have not been considered for this high-level stage of appraisal. It is assumed that these matters would not necessarily be affected by the strategic distribution of housing and so no conclusions on this aspect of the strategic objective have been made at this stage, but are expected to be covered at lower level stages.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	TR-A proposes proportionately low levels of growth for Bradford on Avon. Although mitigation measures are a possibility, any further development at Bradford on Avon, where existing issues concerning an existing long term AQMA are slightly improving, is likely to have adverse effects against this objective. All new development is likely to have some impacts re noise and light pollution.	This strategy proposes proportionately low levels of growth for Bradford on Avon. This is the equivalent of rolling forward the current strategy. Although mitigation measures are a possibility, any further development at Bradford on Avon, where existing issues concerning an existing long term AQMA are slightly improving, is likely to have adverse effects against this objective. All new development is likely to have some impacts re noise and light pollution.	This strategy proposes significantly lower levels of growth than TR-A and TR-B. Although mitigation measures are a possibility, any further development at Bradford on Avon, where existing issues concerning an existing long term AQMA are slightly improving, is likely to have adverse effects against this objective. All new development is likely to have some impacts re noise and light pollution. Therefore, it is likely that there would be a minor adverse effect. This strategy proposes a lower level of growth

	Therefore, it is likely that there would be a moderate adverse effect.	Therefore, it is likely that there would be a moderate adverse effect. As the level of growth remains the same, the degree of effect would be similar when compared to TR-A.	when compared to the roll forward of the current strategy and is therefore less likely to have an effect.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Trowbridge	Trowbridge is lower risk with regards to air quality and is not highlighted as a location of immediate air quality concern. However, rolling forward the current strategy proposes a significant level of growth at Trowbridge and for all strategies at Trowbridge, a range of environmental pollutants are likely to be increased. Vehicle numbers will increase, affecting air quality, there may be a need for new highway infrastructure and development will lead to increased noise and light pollution, and other pollutants. It is noted that Trowbridge does not have any AQMAs and is not considered at risk of an AQMA declaration. All new development is likely to have some impacts re noise and light pollution. Overall, moderate adverse effects are considered likely.	Trowbridge is lower risk with regards to air quality and is not highlighted as a location of immediate air quality concern. However, this strategy proposes a significant level of growth at Trowbridge and for all strategies at Trowbridge, a range of environmental pollutants are likely to be increased. Vehicle numbers will increase, affecting air quality, there may be a need for new highway infrastructure and development will lead to increased noise and light pollution, and other pollutants. It is noted that Trowbridge does not have any AQMAs and is not considered at risk of an AQMA declaration. All new development is likely to have some impacts re noise and light pollution. Overall, moderate adverse effects are considered likely.	Trowbridge is lower risk with regards to air quality and is not highlighted as a location of immediate air quality concern. However, this strategy proposes a significant level of growth at Trowbridge. For all strategies at Trowbridge, a range of environmental pollutants are likely to be increased. Vehicle numbers will increase, affecting air quality, there may be a need for new highway infrastructure and development will lead to increased noise and light pollution, and other pollutants. It is noted that Trowbridge does not have any AQMAs and is not considered at risk of an AQMA declaration. All new development is likely to have some impacts re noise and light pollution. Overall, moderate adverse effects are considered likely.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	All strategies propose a similar level of growth at Warminster. This level of development is likely to have some adverse effects against this objective, however, when considered against that proposed for Trowbridge, effects are considered likely to be minor adverse. All new development is likely to have some impacts re noise and light pollution It is noted that Warminster does not have any AQMAs and is not considered at risk of an AQMA declaration.	All strategies propose a similar level of growth at Warminster. This level of development is likely to have some adverse effects against this objective, however, when considered against that proposed for Trowbridge, effects are considered likely to be minor adverse. All new development is likely to have some impacts re noise and light pollution It is noted that Warminster does not have any AQMAs and is not considered at risk of an AQMA declaration.	All strategies propose a similar level of growth at Warminster. This level of development is likely to have some adverse effects against this objective, however, when considered against that proposed for Trowbridge, effects are considered likely to be minor adverse. All new development is likely to have some impacts re noise and light pollution It is noted that Warminster does not have any AQMAs and is not considered at risk of an AQMA declaration.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Westbury	This strategy proposes proportionately low levels of growth for Westbury. Nonetheless, development of any sort is a risk in an area with a designated AQMA and monitoring for NO ² , PM ¹⁰ and SO ² . Despite this, mitigation opportunities may be achievable. All new development is likely to have some impacts re noise and light pollution.	This strategy proposes a significantly higher level of growth for Westbury. This strategy increases upon the roll forward to focus growth at Westbury. Development of any sort is a risk in an area with a designated AQMA, being monitored for NO ² , PM ¹⁰ and SO ² . Despite this, mitigation opportunities may be achievable. Overall, this strategy is assessed as having a moderate adverse effect at this stage. As growth is significantly higher	This strategy proposes a similar level of growth to TR-A. Nonetheless, development of any sort is a risk in an area with a designated AQMA and monitoring for NO ² , PM ¹⁰ and SO ² . Despite this, mitigation opportunities may be achievable. Overall, this strategy is assessed as having a moderate adverse effect at this stage. This strategy proposes a

	Overall, this strategy is assessed as having a moderate adverse effect at this stage.	the degree of effect will be increased when compared with TR-A and TR-C.	slightly lower, but similar level of growth to TR-A and is therefore likely to lead to a similar level of effect.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Rest of HMA	The level of development proposed in the rest of the HMA is more likely to place development away from many of the county's existing AQMAs and therefore is less likely to have a major negative impact upon these. Due to the dispersed nature of facilities and the lack of public transport provision in certain rural areas, development may lead to a proportionately increased number of journeys by private car which could lead to increased pollutants from vehicles. All new development is likely to have some impacts re noise and light pollution, and this is especially the case in more rural areas. This level of growth is assessed as having minor adverse effects against this objective.	The level of development proposed in the rest of the HMA is more likely to place development away from many of the county's existing AQMAs and therefore is less likely to have a major negative impact upon these. Due to the dispersed nature of facilities and the lack of public transport provision in certain rural areas, development may lead to a proportionately increased number of journeys by private car which could lead to increased pollutants from vehicles. All new development is likely to have some impacts re noise and light pollution, and this is especially the case in more rural areas. This level of growth is assessed as having minor adverse effects against this objective.	The level of development proposed in the rest of the HMA is more likely to place development away from many of the county's existing AQMAs and therefore is less likely to have a major negative impact upon these. Due to the dispersed nature of facilities and the lack of public transport provision in certain rural areas, development may lead to a proportionately increased number of journeys by private car which could lead to increased pollutants from vehicles. All new development is likely to have some impacts re noise and light pollution, and this is especially the case in more rural areas. This level of growth is assessed as having minor adverse effects against this objective.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Overall HMA score	-1.6 Overall, the strategy is assessed as having moderate adverse effects. This is primarily due to the significant level of growth proposed at Trowbridge, together with proposed levels of growth in Bradford on Avon and Westbury, where existing issues are apparent.	-1.6 Overall, TR-B has been assessed as having moderate adverse effects. This is primarily due to the significant level of growth proposed at Trowbridge, together with proposed levels of growth in Bradford on Avon and Westbury, where existing issues are apparent	-1.4 Overall, minor adverse effects are likely. This is primarily due to this strategy proposing lower levels of growth at Bradford on Avon. However, significant effects are still considered likely at Trowbridge and Westbury, where existing issues are apparent.

Conclusions/Recommendations:

- **Strategy TR-C is more sustainable as there are less adverse effects likely.** This is primarily due to this strategy proposing lower levels of growth at Bradford on Avon which has longstanding air quality issues.
- **Strategies TR-A and TR-B are the least sustainable strategies as they are likely to have greater adverse effects.** This is primarily due to the significant level of growth proposed at Trowbridge, together with proposed levels of growth in Bradford on Avon and Westbury, where existing issues are apparent.
- All development strategies lead to additional development and are therefore likely to lead to increased traffic in the identified settlements alongside the wider transport network and consequently increase levels of associated pollutants. A range of other environmental pollutants will also increase with new development.
- Strategy TR-C is only marginally more sustainable than the other two strategies because of the lower proportion of growth allocated to Bradford on Avon. It still allocates a significant amount to Westbury which has a longstanding AQMA and a focus of development on the rural parts of the HMA, whilst it may not adversely affect existing AQMAs, may be located in areas with poor public transport services, thereby increasing private car use, and have additional impacts of noise and light pollution in areas that are currently relatively rural.
- Trowbridge is lower risk with regards to air quality. However, for all strategies at Trowbridge, proposed levels of growth are significant and significant effects are considered likely where mitigation would be problematic.

- Warminster is lower risk with regards to air quality. Proposed levels of growth are low in relative terms. Growth of this scale at Warminster is likely to have some adverse effects in terms of environmental pollution and this is likely to be minor adverse with mitigation considered to be achievable.
- All strategies in the Rest of the HMA are considered likely to have minor adverse effects as development is more likely to be dispersed and locate development away from many of the county's existing AQMAs. However, due to the dispersed nature of facilities and the lack of public transport provision in many rural areas, development may lead to an increased number of private car journeys.
- As the areas of poor air quality in Wiltshire are all traffic related, new development should contribute to improved air quality through reducing the need to travel by private car, promoting policies that promote development of sustainable transport links, promote housing development in sustainable locations and increasing on site vegetation in order to provide carbon sinks. Development led improvements in sustainable transport infrastructure that would otherwise be difficult to achieve may become viable with certain higher levels of growth, both residential and employment.
- It is recommended that where development takes place, improvements in sustainable transport options should be sought to alleviate air quality concerns. Development should consider walking and cycling friendly design that promotes and improves safety for these methods.
- With regards to noise and light pollution, these are generally the result of urban development. Specific locational policies can ensure that development is directed to the most appropriate locations where air quality, noise and light pollution will be avoided or kept to a minimum.
- Electric vehicle use can be encouraged by including charging points in new developments for both private charging at home and charging stations.
- When considering at risk areas, development should be accompanied with mitigation measures such as highway improvements that can alleviate/improve congestion and environmental pollutant issues present and subsequently improve air quality. It is recommended that development in all areas is associated with, where necessary, highway/public transport improvement measures to alleviate air quality concerns.
- If a significant amount of new development continues to be proposed at Westbury, it may be necessary to consider provision of a bypass to the town in order to redirect traffic from the town centre and reduce air quality concerns.

Sustainability Appraisal Objective 5: Minimise impacts on climate change (mitigation) and reduce vulnerability to future climate change effects (adaptation)

Decision-Aiding Question (DAQ) 1: Promote the development of renewable and low carbon sources of energy?

For appraisal at subsequent, more detailed / site-specific SA stages.

DAQ 2: Be located within flood zone 2? If so, are there alternative sites in the area that can be allocated in preference to developing land in flood zone 2? (To be determined through the application of the Sequential Test)

For appraisal at subsequent, more detailed / site-specific SA stages.

DAQ 3: Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere?

Fluvial flood-risk, along with surface and groundwater flooding form part of the settlement-level analysis below. The cumulative impact of development was also considered in order to identify those catchments where an increase in flows as a result of development would have the greatest impact on downstream flood risk. This analysis is based on a strategic assessment of flood risk. Local knowledge will be applied when specific development locations are identified. In terms of flood-risk potential at settlements the following can be stated:

Trowbridge is at low risk of river and groundwater flooding and at high risk of surface water flooding. The cumulative impact of development is assessed as low.

Westbury is at low risk of river flooding and at moderate risk of surface water and groundwater flooding. The cumulative impact of development is assessed as moderate.

Warminster is at moderate risk of river flooding and at high risk of surface water and groundwater flooding. The cumulative impact of development is assessed as moderate.

Bradford on Avon is at high risk of river and surface water flooding and at low risk of groundwater flooding. The cumulative impact of development is assessed as moderate.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Development at Bradford on Avon is potentially constrained by surface water flooding, as well as additional fluvial risk linked to the River Avon. All alternatives direct relatively low levels of development to Bradford. This level of growth is not expected to have significant impacts on flood risk. Consequently, minor adverse effects on this objective are considered likely.	Development at Bradford on Avon is potentially constrained by surface water flooding, as well as additional fluvial risk linked to the River Avon. All alternatives direct relatively low levels of development to Bradford. This level of growth is not expected to have significant impacts on flood risk. Consequently, minor adverse effects on this objective are considered likely.	Development at Bradford on Avon is potentially constrained by surface water flooding, as well as additional fluvial risk linked to the River Avon. All alternatives direct relatively low levels of development to Bradford. This level of growth is not expected to have significant impacts on flood risk. Consequently, minor adverse effects on this objective are considered likely.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Trowbridge	Although all strategies direct substantial growth towards Trowbridge, TR-A – Core Strategy Continued - has the highest level, which makes it harder to avoid surface water flood-risk in particular at Trowbridge. As a consequence, moderate adverse effects are suggested.	Although all strategies, including Core Strategy Continued direct substantial growth to Trowbridge, TR-B has the lowest level. This makes it comparatively easier to accommodate flood-resilient development and, as a consequence, minor adverse effects are suggested.	This strategy has the second highest quantum of growth directed at Trowbridge – levels would be similar to Core Strategy Continued. Surface water flood-risk is particularly evident at the town, consequently moderate adverse effects are suggested.
	Likely effects: moderate adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Warminster	All strategies propose similar levels of development at Warminster. Warminster is at moderate risk of river flooding and at high risk of surface water and groundwater flooding. The levels of growth proposed in all three strategies are considered likely to have moderate adverse effects until development locations are known.	All strategies propose similar levels of development at Warminster. Warminster is at moderate risk of river flooding and at high risk of surface water and groundwater flooding. The levels of growth proposed in all three strategies are considered likely to have moderate adverse effects until development locations are known.	All strategies propose similar levels of development at Warminster. Warminster is at moderate risk of river flooding and at high risk of surface water and groundwater flooding. The levels of growth proposed in all three strategies are considered likely to have moderate adverse effects until development locations are known.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Westbury	Greatest risks in Westbury are estimated to occur through ground and surface water flooding. Strategy TR-A has low relative development directed at the town which means that it is more likely that new development could be accommodated in a flood-	Greatest risks in Westbury are estimated to occur through ground and surface water flooding. This development strategy directs substantially greater growth to the town compared to the others, including Core Strategy Continued	Greatest risks from flooding in Westbury are estimated to occur through ground and surface water flooding. This strategy has relatively low growth directed at the town – commensurate with Core Strategy Continued - which means that it is more likely that new development could

	resilient manner, although this cannot be confirmed until sites are identified. Minor adverse effects are therefore suggested at this strategic level of analysis.	- and this is assessed as likely to have moderate adverse effects here.	be accommodated in a flood-resilient manner, although this cannot be confirmed until sites are identified. Minor adverse effects are therefore suggested at this strategic level of analysis.
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	This strategy has the lowest level of development directed to Rest of HMA, which means it is more likely that new development could avoid areas at risk of flooding, although this cannot be confirmed until sites are identified. Due to the relatively low level of growth, the strategy has been assessed as having minor adverse effects until more is known on a local level.	This strategy has a moderate level of development directed to Rest of HMA – more than under Core Strategy Continued. Due to the relatively low level of growth, the strategy has been assessed as having minor adverse effects until more is known on a local level.	TR-C has the highest level of development directed to Rest of HMA – considerably higher than Core Strategy Continued. Due to this higher level of growth, the strategy has been assessed as having moderate adverse effects until more is known on a local level. Any proposed locations for development could present a higher potential for flooding.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Overall HMA score	-1.4 Overall the strategy is likely to have minor adverse effects as regards objective 5.	-1.4 Overall the strategy is likely to have minor adverse effects as regards objective 5	-1.6 Overall this strategy is likely to have moderate adverse effects on objective 5, mainly due to risks associated with the Trowbridge, Warminster and Rest of HMA areas.

Conclusions/Recommendations:

- **Strategies TR-A and TR-B are considered the more sustainable options as there are less adverse effects likely overall.**
- **Strategy TR-C is considered the least sustainable strategy as it is likely to have greater adverse effects.** This is primarily due to the likelihood of increased flood risk at Trowbridge, Warminster and in the Rest of the HMA.
- Whilst all areas within Trowbridge HMA demonstrate some areas at risk of flooding, some places are more constrained than others. Across all alternative strategies it is Warminster that exhibits the greatest potential for adverse impacts under this objective owing to high levels of surface and groundwater flood-risk. Trowbridge has been assessed as having likely significant adverse effects under the two higher growth options, but this may well be reviewed when more specific growth locations are known.
- Of all the localities being assessed in this HMA, Trowbridge and Westbury are likely to offer the best opportunities for flood resilience. However, for strategies that propose increased growth quanta at these towns, moderate adverse effects are considered likely.
- For all new development, in order to provide climate change adaptation and mitigation and improve flood resilience, drainage solutions must incorporate green infrastructure and/or Sustainable Drainage Systems. The Wiltshire Strategic Flood Risk Assessment informs as regards the sequential test and, if needed, the exception test, and should be consulted in further, more detailed assessment of potential development locations.
- With the most significant risks being identified at Warminster it remains to be seen whether development locations would avoid the most flood-risk prone areas and/or whether parts of specific sites can be set aside to make space for water flows, especially under storm scenarios. In terms of the main settlements in Trowbridge HMA, the headline recommendations as regards flood resilience are:
- Trowbridge: Due to surface water flood risk, stringent policy with regards to the control of surface water discharges from new development would be required.

- Westbury: Due to surface water flood risk and cumulative impacts, stringent policy with regards to the control of surface water discharges from new development would be required. As high groundwater levels may impede infiltration-based sustainable drainage, site investigations would be needed to prove viability.
- Bradford on Avon: Due to river and surface water flood risk and cumulative impacts, stringent policy with regards to the control of surface water discharges from new development would be required.
- Warminster: Due to river and surface water flood risk and cumulative impacts, stringent policy with regards to the control of surface water discharges from new development would be required. It is recommended that development sites are not allocated in areas at high risk of groundwater flooding.

Sustainability Appraisal Objective 6: Protect, maintain and enhance the historic environment

Decision-Aiding Question (DAQ) 1: Conserve and enhance World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas and Historic Parks & Gardens, sites of archaeological interest, undesignated heritage assets and their settings?

Whilst this level of analysis makes reference to designated and non-designated heritage assets, these will be appraised in more detail at the site-specific stage. At a strategic level, key heritage assets in/around settlements are as follows:

Trowbridge: assets include the town centre and Newtown conservation areas, the historic cores of nearby villages in the surrounding areas, notably Southwick, North Bradley, Staverton, Hilperton [conservation area] and Semington. The Hilperton area has good preservation of medieval landscape character, and the Kennet & Avon Canal and associated WWII defence features are a valued asset.

Westbury: assets include the town centre conservation area, Bratton Camp scheduled monument and white horse and their settings; listed Heyward House and its setting; the scheduled moated site and setting at Penleigh; the land surrounding Leighton House; numerous Designated Farmsteads.

Warminster: assets include the town centre conservation area, prominent hill-forts at Cley Hill, Battlesbury and Scratchbury (west and north-east of the town) and Bishopstrow conservation area (south-east).

Bradford on Avon: assets include the town centre conservation area, registered parks and gardens at Belcombe Court and The Hall and their settings, plus conservation areas in nearby Turleigh, Winsley, Avoncliff and Lower Westwood (west and south-west). The Kennet & Avon Canal to the south is also a highly-valued asset.

DAQ 2: Maintain and enhance the character and distinctiveness of settlements through high quality and appropriate design, taking into account the management objectives of Conservation Areas?

Whilst this level of analysis makes some reference to historic landscape character and townscape quality, design and conservation areas will feature more strongly in subsequent, more detailed / site-specific, appraisal.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Bradford on Avon has a range of assets. At this spatial level of analysis and given the relatively low development quantum directed towards the settlement and its environs, Core Strategy Continued would suggest minor adverse effects in/around Bradford.	Bradford on Avon has a range of assets. At this spatial level of analysis and given the relatively low development quantum directed towards the settlement and its environs, this strategy is also considered likely to have minor adverse effects in/around Bradford.	Bradford on Avon has a range of assets. At this spatial level of analysis and given the relatively low development quantum directed towards the settlement and its environs, this strategy is also considered likely to have minor adverse effects in/around Bradford.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse

Trowbridge	<p>Under a continuation of the Wiltshire Core Strategy, designated and non-designated heritage assets in/around Trowbridge may be significantly affected by this high relative growth. Due to a lack of brownfield sites within the town to accommodate this growth, development of greenfield sites on the town edge may impact on neighbouring villages' heritage assets. In addition to the heritage and character highlighted above, separation from the WWII defensive 'Stop Line' to the north of the town should be maintained. At this spatial level of analysis this strategy would suggest likely moderate adverse effects upon designated and non-designated heritage assets and their settings. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.</p>	<p>Designated and non-designated heritage assets in/around Trowbridge may be significantly affected by this high relative growth. Due to a lack of brownfield sites within the town to accommodate this growth, development of greenfield sites on the town edge may impact on neighbouring villages' heritage assets. In addition to the heritage and character highlighted above, separation from the WWII defensive 'Stop Line' to the north of the town should be maintained. At this spatial level of analysis this strategy would suggest likely moderate adverse effects upon designated and non-designated heritage assets and their settings. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.</p>	<p>Designated and non-designated heritage assets in/around Trowbridge may be significantly affected by this high relative growth. Due to a lack of brownfield sites within the town to accommodate this growth, development of greenfield sites on the town edge may impact on neighbouring villages' heritage assets. In addition to the heritage and character highlighted above, separation from the WWII defensive 'Stop Line' to the north of the town should be maintained. At this spatial level of analysis this strategy would suggest likely moderate adverse effects upon designated and non-designated heritage assets and their settings. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.</p>
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	<p>Warminster and its environs are characterised by the presence of conservation areas, listed buildings, registered parks & gardens, dispersed farmsteads and other scheduled assets. However, the quantum proposed in/around Warminster, similar under each strategy, appears to be unlikely to have significant effects on this objective. Minor adverse effects are thus considered likely. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.</p>	<p>Warminster and its environs are characterised by the presence of conservation areas, listed buildings, registered parks & gardens, dispersed farmsteads and other scheduled assets. However, the quantum proposed in/around Warminster, similar under each strategy, appears to be unlikely to have significant effects on this objective. Minor adverse effects are thus considered likely. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.</p>	<p>Warminster and its environs are characterised by the presence of conservation areas, listed buildings, registered parks & gardens, dispersed farmsteads and other scheduled assets. However, the quantum proposed in/around Warminster, similar under each strategy, appears to be unlikely to have significant effects on this objective. Minor adverse effects are thus considered likely. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.</p>
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Westbury	<p>Westbury has designated and non-designated heritage assets which should be protected and enhanced and there is the potential for further coalescence with Dilton Marsh, Hawkeridge and the smaller settlements and farmsteads around Brokerswood leading to adverse impacts on their rural character. However, the level of growth proposed under this strategy appears to be unlikely to have significant effects on this objective. Minor adverse effects are thus considered likely. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.</p>	<p>Westbury is the settlement in the HMA which, under this development strategy, would witness a notable increase in growth. This appears to be consistent with a place where challenges under Objective 6 are reduced compared with other settlements. This notwithstanding the town has designated and non-designated assets which should be protected and enhanced. There is, moreover, the potential for further coalescence with Dilton Marsh, Hawkeridge and the smaller settlements/ farmsteads around Brokerswood leading to adverse impacts on their rural character. The above factors, in combination with a moderate land-take for business growth, indicate moderate adverse effects on heritage assets at/around this locality.</p>	<p>Westbury has designated and non-designated heritage assets which should be protected and enhanced and there is the potential for further coalescence with Dilton Marsh, Hawkeridge and the smaller settlements and farmsteads around Brokerswood leading to adverse impacts on their rural character. However, the level of growth proposed under this strategy, similar to TR-A, appears to be unlikely to have significant effects on this objective. Minor adverse effects are thus considered likely. However, this issue will be clarified as site-specific development propositions emerge and the potential impacts are assessed.</p>

	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	The nature of heritage assets distribution means that rural development locations around Rest of HMA would also have to be selected carefully as regards possible growth. Development in these locations, albeit still unknown, may be considered as likely to have minor adverse effects on this objective.	Under this strategy moderately high growth rates – greater than under Core Strategy Continued - mean that locations in Rest of HMA would have to be selected very carefully. However, this level of growth is considered unlikely to have significant effects on heritage assets. Minor adverse effects are therefore likely since such development localities are still unknown.	The nature of heritage assets distribution means that locations across Rest of HMA would have to be selected carefully as regards possible growth. Strategy TR-C raises growth quanta considerably in more rural areas, especially vis-à-vis Core Strategy Continued. On this basis moderate adverse effects for Rest of HMA are likely at this strategic level of analysis, particularly since such development locations are still unknown.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Overall HMA score	-1.2 In light of the above, the assessment of the strategy overall suggests likely minor adverse effects against Objective 6. The only significant adverse effects are likely at Trowbridge due to the growth quantum proposed.	-1.4 In light of the above, the assessment of the strategy overall suggests likely minor adverse effects against Objective 6. Significant adverse effects are likely at Trowbridge and Westbury due to the growth quantum proposed.	-1.4 In light of the above, the assessment of the strategy overall suggests likely minor adverse effects against Objective 6. Significant adverse effects are likely at Trowbridge and Rest of the HMA due to the growth quantum proposed.

Conclusions/Recommendations:

- Although all strategies were assessed as having likely minor adverse effects overall, **Strategy TR-A is considered to be the more sustainable option** as there are less adverse effects likely. The only significant adverse effects are likely at Trowbridge due to the growth quantum proposed at the town.
- **Strategies TR-B and TR-C score equally and are considered the least sustainable strategies** as they are likely to have greater adverse effects. This is primarily due to higher proposed levels of growth at Marlborough, West of Swindon and in the Rest of the HMA.
- For all development strategies at Trowbridge there are likely significant adverse effects on designated and non-designated heritage assets and their settings at a strategic level. Due to a lack of brownfield sites within the town to accommodate this growth, development of greenfield sites on the town edge may impact on neighbouring villages' heritage assets.
- None of the strategies for Bradford on Avon and Warminster are considered likely to have significant effects on this objective, given the relatively low growth proposed.
- The higher growth scenarios for Westbury (TR-B) and Rest of the HMA (TR-C) are considered likely to have significant adverse effects on these settlements/areas. However, the nature of heritage assets is site-specific, and, as such, adverse effects remain unclear until development locations start to become finalised, and successive assessment able to demonstrate that impacts can be limited.
- It appears possible that the HMA can accommodate the proposed quantum overall without likely significant effects. It may also be possible to direct additional growth to Bradford on Avon, Warminster, Westbury and Rest of the HMA without leading to likely significant effects, but this will depend on the specific development locations.
- In order to reduce significant adverse effects at Trowbridge, localised areas of search may exist towards the north and north-east of the settlement, although there is a strong marker on conserving the integrity of the WWII GHQ 'Blue Line' relating to the Avon and the Kennet & Avon Canal. Small-scale growth may be locally feasible towards the south and east. However, in order to accommodate such a substantial quantum of development, to limit adverse impacts, any strategy would benefit from both assessing the green belt to the north and west of Trowbridge and maximising the ability of brownfield land in the town centre to deliver new housing and employment.

- In/around Bradford, in order to reduce significant adverse effects, small-scale development may be locally appropriate. The town nevertheless features a wide range of designated and non-designated heritage assets. Development-led increases on traffic flows would put pressure on assets within the historic core. It is possible that a strategy for accommodating proposed development might be a reappraisal of the green belt that surrounds the town.
- As regards Westbury, there is probably scope for development in selected locations close to the town in an arc comprising the west around to the north-east. Other areas around the town appear to be more constrained in terms of heritage assets and their settings.
- In/around Warminster, in order to limit significant adverse effects, there could be localised scope for small-scale development inside the A36/A350. The town nevertheless features a wide range of designated and non-designated heritage assets both within and without the urban area and development would have to be planned very carefully.
- New development should seek to protect and enhance the setting of designated and non-designated heritage assets, and it may be possible to limit harm to heritage assets and their settings; in/around all settlements local impact assessments at site-specific stage, including for archaeology, would be required to test this.

Sustainability Appraisal Objective 7: Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place

Decision-Aiding Question (DAQ) 1: Minimise impact on and where appropriate enhance nationally designated landscapes and their settings and locally valued landscapes?

Whilst this strategic-level analysis appraises designated and locally-valued assets, local assets will become more prominent during detailed / site-specific SA. At this stage, at and around the settlements, the following may be noted.

Bradford on Avon: assets include the Cotswolds AONB to the west and south of the town, West Wiltshire Green Belt, Kennet & Avon Canal and Barton Farm Country Park.

Trowbridge: assets include the West Wiltshire Green Belt to the north and west of the town and scattered ancient woodland and historic parkland around the town's periphery. The Hilperton area is an example of good preservation of medieval landscape character, and the Kennet & Avon Canal is a valued feature. There is a risk of coalescence with neighbouring villages such as Hilperton, North Bradley and Southwick.

Westbury: assets include the Salisbury Plain Special Landscape Area to the town's south, whilst greater coalescence with Dilton Marsh, Hawkeridge and the smaller settlements and farmsteads around Brokerswood could lead to adverse impacts on rural character.

Warminster: assets include Cranborne Chase & West Wilts AONB to the south and west, Salisbury Plain Special Landscape Area, and three prominent hill-forts.

DAQ 2: Protect rights of way, public open space and common land?

These features will be assessed in greater detail in successive rounds of sustainability appraisal when the analysis becomes more detailed.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	This is a relatively low level of development for the town. However, the West Wiltshire Green Belt surrounds the town and the Cotswolds AONB borders the town to the west and south. Therefore, at	This is a relatively low level of development for the town. However, the West Wiltshire Green Belt surrounds the town and the Cotswolds AONB borders the town to the west and south. Therefore, at this strategic level, it may be difficult to	Significantly lower proposed growth under this strategy. Despite difficulties against this objective, the quantum might be sustainably accommodated. Minor adverse effects are likely at Bradford on Avon.

	<p>this strategic level, it may be difficult to accommodate this growth without significant effects on landscape and moderate adverse effects are considered likely.</p> <p>Likely effects: moderate adverse</p>	<p>accommodate this growth without significant effects on landscape and moderate adverse effects are considered likely.</p> <p>Likely effects: moderate adverse</p>	<p>Likely effects: minor adverse</p>
Trowbridge	<p>The significant levels of growth proposed at Trowbridge under all three strategies are considered likely to have moderate adverse effects that would be problematic to mitigate. The West Wiltshire Green Belt comes up to the edge of the town in the north and west, the villages of Hilperton, North Bradley and Southwick are in close proximity to the town and there are significant areas of ancient woodland to the south and east. All of these constraints limit the availability of sustainable development locations.</p> <p>Likely effects: moderate adverse</p>	<p>The significant levels of growth proposed at Trowbridge under all three strategies are considered likely to have moderate adverse effects that would be problematic to mitigate. The West Wiltshire Green Belt comes up to the edge of the town in the north and west, the villages of Hilperton, North Bradley and Southwick are in close proximity to the town and there are significant areas of ancient woodland to the south and east. All of these constraints limit the availability of sustainable development locations.</p> <p>Likely effects: moderate adverse</p>	<p>The significant levels of growth proposed at Trowbridge under all three strategies are considered likely to have moderate adverse effects that would be problematic to mitigate. The West Wiltshire Green Belt comes up to the edge of the town in the north and west, the villages of Hilperton, North Bradley and Southwick are in close proximity to the town and there are significant areas of ancient woodland to the south and east. All of these constraints limit the availability of sustainable development locations.</p> <p>Likely effects: moderate adverse</p>
Warminster	<p>The landscape around Warminster is considered better able to accommodate this level of proposed growth without significant effects. Minor adverse effects are likely at this strategic assessment stage.</p> <p>Likely effects: minor adverse</p>	<p>The landscape around Warminster is considered better able to accommodate this level of proposed growth without significant effects. Minor adverse effects are likely at this strategic assessment stage.</p> <p>Likely effects: minor adverse</p>	<p>The landscape around Warminster is considered better able to accommodate this level of proposed growth without significant effects. Minor adverse effects are likely at this strategic assessment stage.</p> <p>Likely effects: minor adverse</p>
Westbury	<p>It is considered that Westbury may have the greatest scope for growth under this objective. There are no national landscape designations affecting Westbury and development would be possible, particularly to the north and west of the town, with few landscape constraints. However minor adverse effects on the landscape are likely.</p> <p>Likely effects: minor adverse</p>	<p>It is considered that Westbury may have the greatest scope for growth under this objective. There are no national landscape designations affecting Westbury and development would be possible, particularly to the north and west of the town, with few landscape constraints. However minor adverse effects on the landscape are likely.</p> <p>Likely effects: minor adverse</p>	<p>It is considered that Westbury may have the greatest scope for growth under this objective. There are no national landscape designations affecting Westbury and development would be possible, particularly to the north and west of the town, with few landscape constraints. However minor adverse effects on the landscape are likely.</p> <p>Likely effects: minor adverse</p>
Rest of HMA	<p>Designations and locally-valued landscapes are widespread across the HMA, meaning that locations in Rest of HMA would have to be selected carefully as regards possible development. Minor adverse effects are likely since development localities are still unknown.</p> <p>Likely effects: minor adverse</p>	<p>Designations and locally-valued landscapes are widespread across this HMA, meaning that locations in Rest of HMA would have to be selected carefully as regards possible development, given that the growth quantum would be raised vis-à-vis Core Strategy Continued. Minor adverse effects are hence likely since such development localities are still unknown.</p> <p>Likely effects: minor adverse</p>	<p>The presence of considerable areas of AONB, Green Belt, Special Landscape Area (SLA), and other locally-valued landscapes means that locations for development in Rest of HMA would have to be selected carefully. Growth levels are highest under this scenario and are considerably greater than TR-A and TR-B. Moderate adverse effects are likely since such development localities are still unknown.</p> <p>Likely effects: moderate adverse</p>

Overall HMA score	-1.4 The strategy as a whole is considered likely to have minor adverse effects against Objective 7, but with significant adverse effects likely at Trowbridge and Bradford on Avon.	-1.4 The strategy as a whole is considered likely to have minor adverse effects with significant adverse effects likely at Trowbridge and Bradford on Avon.	-1.4 The strategy as a whole is considered likely to have minor adverse effects against Objective 7, but with significant adverse effects likely at Trowbridge and in the Rest of the HMA.
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Conclusions/Recommendations:

- **All strategies score equally, are assessed as having likely minor adverse effects on landscape overall and no one strategy is considered to be the more sustainable.** However, all of these strategies are still considered likely to have significant landscape impacts in certain settlements/areas within the HMA.
- All growth scenarios at Trowbridge are considered likely to have significant landscape impacts which would be difficult to accommodate and to mitigate. The West Wiltshire Green Belt comes up to the edge of the town in the north and west, the villages of Hilperton, North Bradley and Southwick are in close proximity to the town and there are significant areas of ancient woodland to the south and east. All of these constraints limit the availability of sustainable development locations in landscape terms.
- All development strategies direct substantial development towards Trowbridge. There may be limited possibilities for growth to the north and north-east of the town, and more localised scope for scattered development to the east and south, although this is potentially in conflict with the Trowbridge Bat Mitigation Strategy. There are some opportunities within the town to develop previously-developed land but, given proposed growth quanta and its Principal Settlement status, there is a rationale for reviewing the green belt boundary to test whether the town might expand to the west.
- It is suggested that seeking to accommodate the proposed higher levels of development in and around Bradford on Avon could also generate significant impacts upon national and local landscape assets. The town lies within the setting of the AONB, which under the Duty of Regard, would need to be protected and enhanced, and the West Wiltshire Green Belt surrounds the town. Moderate adverse effects are thus indicated at a strategic level for two strategies (TR-A and TR-B). The details of adverse impacts are at this stage unclear, meaning that site-specific development would have to be very carefully directed, and successive assessment able to demonstrate that impacts can be mitigated. To mitigate adverse impacts, it appears that scattered development could be locally appropriate and there is also a strong rationale for assessing the green belt boundary around the town.
- There are no significant landscape effects noted at Westbury or Warminster from the proposed levels of growth and it may be possible for these two towns to accommodate higher levels of growth in landscape terms.
- The presence of considerable areas of AONB, Green Belt, Special Landscape Area (SLA), and other locally-valued landscapes means that locations for development in the Rest of the HMA would have to be selected carefully. Lower growth levels may be able to be accommodated without likely significant effects.
- Based on the above it is therefore recommended that, in landscape terms, to seek to direct a proportion of growth away from Trowbridge and Bradford on Avon, and towards Westbury and to a lesser extent, Warminster. It is considered that Westbury may have the greatest scope for growth under this objective; there are no national landscape designations affecting Westbury and development would be possible, particularly to the north and west of the town, with few landscape constraints. It should be possible to accommodate proposed quanta at Warminster under all strategies, though AONB setting remains a consideration.

Sustainability Appraisal Objective 8: 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 Question (DAQ) 1: Provide an adequate supply of affordable housing?

Delivery of homes in **Trowbridge** since 2006 has been below planned rates. This is mainly due to delays in bringing forward the strategic allocation at Ashton Park. The anticipated rate of construction means that the site will be contributing to the supply of homes beyond 2026. The ratio of house price to earnings for the Trowbridge Community Area is lower than the Wiltshire average but has increased from 7.16 in 2008 to 8.00 in 2017. This reflects a trend seen nationally but may, in part, have been due to supply of homes in recent years being at a lower rate than planned for in the current WCS. 33.6% of completions during the period 1/4/09 – 31/3/18 have been affordable.

For **Bradford on Avon** the house price to earnings ratio has risen significantly from 9.84 in 2008 to 14.04 in 2017. The town is also highly constrained by Green Belt, considerably limiting land available for housing development. Overall the number of homes delivered has been broadly as planned in the WCS but only 22.8% of homes built during the period 1/4/09 – 31/3/18 were affordable homes, substantially below that required under Core Policy 43.

Housing delivery in **Warminster** since 2006 has also been below expected rates. This is primarily due to delays in bringing forward the strategic allocation to the west of the town. The site will therefore provide a supply of homes beyond 2026. In Warminster the ratio of house price to earnings has risen slightly from 7.85 to 8.83, marginally below the Wiltshire average. This reflects a trend seen nationally but may, in part, have been due to supply of homes in recent years being at a lower rate than planned in the current WCS, although 33.8% of all homes built since 2009 have been affordable housing, which is above the minimum target of 30%.

At **Westbury** the house price to earnings ratio has also increased slightly to 8.26, remaining below the average for Wiltshire but higher than the UK average, despite house building in recent years being marginally above planned levels. Affordable housing was 34.6% of all homes built between 1/4/09 – 31/3/18.

For the **Rest of the HMA** (the rural area) homes have been delivered at or above expected levels. Affordability ratios are, however, higher in rural areas, which reflects the limited supply of homes at large and small villages in recent years.

The updated housing requirement means that growth for the HMA will be marginally lower (by approximately 800 homes) than the number of homes allocated for 2006 – 2026 under the WCS. It is recognised that, as 65% of this proposed lower housing requirement for the Trowbridge HMA is already committed, the impact of new housing on affordability will be limited.

SA conclusions relate to the ability of the strategy to deliver affordable homes where they are needed taking into account factors such as where house price to income ratios are highest.

DAQ 2: Support the provision of a range of house types and sizes to meet the needs of all sectors of the community?

Developments providing a mix of house types and sizes can be delivered on small or large sites. For this high-level stage of appraisal, it is difficult to make notable distinctions to make notable distinctions between the options. It is assumed that these matters would not necessarily be affected by the strategic distribution of housing and so no conclusions on this aspect of the strategic objective have been made at this stage.

DAQ 3: Deliver high quality residential development?

High quality developments providing a mix of tenures can be delivered on small or large sites. For this high-level stage of appraisal, it is difficult to make notable distinctions to make notable distinctions between the options in relation to the quality of housing or mix of dwelling sizes, types and tenures. It is assumed that these matters would not necessarily be affected by the strategic distribution of housing and so no conclusions on this aspect of the strategic objective have been made at this stage.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Under Strategy TR-A Bradford on Avon would be expected to deliver 570 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 310 dwellings. TR-A is one of the strategies which directs higher levels of housing to Bradford on Avon (although still	Under Strategy TR-B Bradford on Avon would be expected to deliver 570 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 310 dwellings. TR-B is one of the strategies which directs higher levels of housing to Bradford on Avon (although still modest) where	Under Strategy TR-C Bradford on Avon would be expected to deliver 300 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 40 dwellings. This strategy directs the lowest levels of housing to Bradford on Avon (effectively tying development to

	modest) where affordability ratios are the highest and delivery of affordable housing lowest. Relative to strategy TR-C this could have a minor positive effect in Bradford Avon. The affordability ratio would not be significantly affected given low growth proposed.	affordability ratios are the highest and delivery of affordable housing lowest. Relative to strategy TR-C this could have a minor positive effect in Bradford Avon. The affordability ratio would not be significantly affected given low growth proposed.	current commitments) The town has the highest affordability ratios and delivery of affordable housing lowest. Relative to strategy TR-A and TR-B this could have a minor adverse effect on the supply of affordable housing. The affordability ratio would not be significantly affected given low growth proposed.
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor adverse
Trowbridge	Under Strategy TR-A Trowbridge would be expected to deliver 6520 dwellings from 2016-2036 - higher than other strategies. Taking into account existing commitments, this leaves a residual requirement of 2930 dwellings. Although delivery in Trowbridge has been slow, those that have been built have delivered affordable housing above 30% target levels. Continuation of the current strategy could, therefore, result in a moderate positive effect in terms of affordable housing supply at the principal settlement.	Under Strategy TR-B Trowbridge would be expected to deliver 5400 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 1805 dwellings. This distribution significantly reduces the amount to be delivered at the principal settlement of Trowbridge (against the current strategy). Such a reduction, compared to the current strategy, would result in fewer affordable homes than strategy TR-A but there are still a substantial number of homes to be allocated in a location that has been delivering affordable housing above the target level of 30%. On balance, therefore, it is considered this strategy is likely to result in a minor positive effect on the supply of affordable homes at the principal settlement.	Under Strategy TR-C Trowbridge would be expected to deliver 6130 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 2535 dwellings. This distribution reduces the amount to be delivered at the principal settlement of Trowbridge (against the current strategy) by about 500 dwellings). Such a reduction, compared to the current strategy, would result in fewer affordable homes than strategy TR-A but there are still a substantial number of homes to be allocated in a location that has been delivering affordable housing above the target level of 30%. On balance, therefore, it is considered this strategy is likely to result in a moderate positive effect on the supply of affordable homes at the principal settlement.
	Likely effects: moderate positive	Likely effects: minor positive	Likely effects: moderate positive
Warminster	Under Strategy TR-A Warminster would be expected to deliver 1840 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 50 dwellings. At Warminster this strategy effectively ties growth to current levels of commitments. Although housing delivery in the town has been slow those homes that have been built have provided affordable housing above target rates. Such a low residual requirement would be likely to have a neutral effect on the supply of affordable homes.	Under Strategy TR-B Warminster would be expected to deliver 1950 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 160 dwellings. At Warminster this strategy provides for a small amount of additional housing. Although housing delivery in the town has been slow those homes that have been built have provided affordable housing above target rates. Such a modest residual requirement would, therefore, be likely to have a minor positive effect on the supply of affordable homes.	Under Strategy TR-C Warminster would be expected to deliver 1840 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 50 dwellings. At Warminster this strategy effectively ties growth to current level of commitments. Although housing delivery in the town has been slow those homes that have been built have provided affordable housing above target rates. Such a low residual requirement would, therefore, be likely to have a neutral effect on the supply of affordable homes.
	Likely effects: neutral	Likely effects: minor positive	Likely effects: neutral
Westbury	Under Strategy TR-A Westbury would be expected to deliver 1435 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 330 dwellings. Modest levels of housing are identified at Westbury which provides limited opportunity for the supply of affordable housing in a location that has been	Under Strategy TR-B Westbury would be expected to deliver a significantly higher 2130 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 1025 dwellings. Levels of housing to be identified at Westbury are increased in this strategy which provides an improved opportunity for the supply of affordable housing in a location that has been	Under Strategy TR-C Westbury would be expected to deliver 1530 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 425 dwellings. Modest levels of housing are identified at Westbury which provides limited opportunity for the supply of affordable housing in a location that has been delivering

	delivering housing slightly above anticipated rates and target levels of affordable housing. Consequently, given modest levels of growth proposed at Westbury, there is likely to be a minor positive effect on the supply of affordable housing.	delivering housing slightly above anticipated rates and target levels of affordable housing. Consequently, there is likely to be a moderate positive effect on the supply of affordable housing at the town.	housing slightly above anticipated rates and target levels of affordable housing. Consequently, given modest levels of growth proposed at Westbury, there is likely to be a minor positive effect on the supply of affordable housing.
	Likely effects: minor positive	Likely effects: moderate positive	Likely effects: minor positive
Rest of HMA	Under Strategy TR-A the Rest of the HMA would be expected to deliver 635 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 255 dwellings. A continuation of relatively low levels of housing growth at small and large villages is therefore likely to exacerbate affordability issues in these parts of the HMA. The opportunity for the delivery of affordable housing in rural areas is however limited by appropriate site size and therefore the quantity of new affordable homes is likely to be small. These factors on balance are likely to result in a minor adverse effect on the supply of affordable homes in the rest of the HMA.	Under Strategy TR-B the Rest of the HMA would be expected to deliver 950 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 570 dwellings. The provision of homes in the rural areas under this strategy would broadly match rates seen in the past 10 years (which have been above WCS rates) but could potentially be targeted to help to support the vitality of rural areas, where a need has been identified. Therefore, overall, a small increase in levels of housing growth at small and large villages under Strategy TR-B is unlikely to be sufficient to address affordability issues in the rural parts of the HMA. This strategy would therefore be likely to result in a neutral effect on the supply of affordable homes in the rest of the HMA.	Under Strategy TR-C the Rest of the HMA would be expected to deliver 1200 dwellings from 2016-2036. Taking into account existing commitments, this leaves a residual requirement of 820 dwellings. This strategy provides for the highest levels of growth in the rest of the HMA and would see delivery rates above those achieved in the past 10 years. An increase in levels of housing growth at small and large villages, compared to Strategies TR-A and TR-B is unlikely to have great effect on affordability issues in the rural areas. (i.e. reverse the trend) but may provide more opportunities to deliver affordable homes. The opportunity for the delivery of affordable housing in rural areas is however limited by appropriate site size and therefore the quantity of new affordable homes is likely to be small. These factors on balance are likely to result in a minor positive effect on the supply of affordable homes in the rest of the HMA.
	Likely effects: minor adverse	Likely effects: neutral	Likely effects: minor positive
Overall HMA score	0.6 Overall, considering the distribution of housing across all settlements/areas, this strategy is likely to have a minor positive effect on this objective.	1 Overall, considering the distribution of housing across all settlements/areas, this strategy is likely to have a minor positive effect on this objective, but benefits will be greater than strategies TR-A and TR-C.	0.6 Overall, considering the distribution of housing across all settlements/areas, this strategy is likely to have a minor positive effect on this objective.
Conclusions/Recommendations:			
<ul style="list-style-type: none"> Based on scores overall across all settlements/areas, Strategy TR-B is considered the most sustainable strategy against this objective as it is likely to have greater sustainability benefits. Strategies TR-A and TR-C score equally in the assessment and are considered the least sustainable as they are likely to have fewer sustainability benefits overall. Overall the housing requirement for the Trowbridge HMA is lower (by approx. 800 dwellings) than for the current plan period. However, this requirement is based on an assessment of need and therefore is not, in itself, an indication of a negative effect. None of the strategies under consideration are likely to have significant benefits against this objective. To increase the benefits for affordable and market housing provision in this HMA, the overall requirement would need to be significantly higher. 			

- Strategy TR-B allocates the lowest number of homes to the principal settlement of Trowbridge, which would affect a continuation of historic delivery of dwellings at the town. This strategy would, however, also mean that the remaining housing requirement would be distributed more evenly across the HMA which is considered more likely to result in greater positive effects than Strategies TR-A and TR-C, in terms of the provision of affordable homes. For this reason, Strategy TR-B is the preferred option. TR-C would be the least likely to provide affordable homes where they are most needed.
- In Bradford on Avon the house price to earnings ratio has risen significantly from 9.84 in 2008 to 14.04 in 2017. The town is also highly constrained by Green Belt, considerably limiting land available for housing development. It is unclear whether the affordability ratio would be significantly affected given modest growth proposed in any of the strategies. The provision of affordable housing at Bradford on Avon should be prioritised to meet identified needs, perhaps through application of a specific affordable housing policy requirement for the town that is higher than for other parts of Wiltshire, subject to viability testing.
- At Trowbridge, strategies TR-A and TR-C are both likely to have significant benefits for this objective, but the reduced quanta under TR-B would only be likely to have minor benefits. However, TR-B, proposing higher growth at Westbury, is likely to have significant benefits for Westbury.
- At Warminster, the strategies effectively tie growth to current levels of commitments or only provide a small number of additional dwellings. Such modest numbers would, therefore, be likely to have only minor positive or neutral effects on the supply of affordable homes and there would need to be a significant increase to increase the benefits at Warminster.
- For the Rest of the HMA (the rural area), affordability ratios are higher which reflects the limited supply of homes at large and small villages in recent years, relative to higher tier settlements. Across all strategies, the proposed requirements are only likely to have minor benefits at most and provision would need to be significantly higher to make any real difference to affordability. A continuation of relatively low levels of housing growth at small and large villages is therefore likely to exacerbate affordability issues in rural parts of the HMA. The opportunity for the delivery of affordable housing in rural areas is however limited by appropriate site size and therefore the quantity of new affordable homes is likely to be small. A rural facilities survey should be undertaken to identify where the provision of homes could be targeted to help support the vitality of rural settlements in the HMA.

Sustainability Appraisal Objective 9: Reduce poverty and deprivation and promote more inclusive communities with better services and facilities.

Decision-Aiding Question (DAQ) 1: Maximise opportunities within the most deprived areas?

Within the Trowbridge HMA there are areas of deprivation in Trowbridge and Westbury. There is a risk of social isolation among older people at all of the settlements in this HMA.

Trowbridge contains areas of high deprivation, with 15% of the local population living in areas of high deprivation. Additionally, a higher than Wiltshire wide average number of children and young people live in low-income families.

Westbury has pockets which suffer from deprivation, with 8% of the residents living in areas of high deprivation. Additionally, a higher than Wiltshire wide average number of children and young people live in low-income families and a higher than average rate of 0-25 years olds supported by Children's social care.

Warminster is subject to a higher than average rate of 0 to 25-year olds supported by children's social care.

DAQ 2: Be accessible to educational, health, amenity greenspace, community and town centre facilities which are able to cope with the additional demand?

The three secondary schools in **Trowbridge** may be at or exceeding capacity from existing planned housing by 2026, a new secondary school may be secured as part of the known development at Ashton Park, but additional land would be needed to meet the needs of further development. New primary provision is expected to be required, although there is limited scope to expand existing provision. There are high levels of investment planned in health services in Trowbridge, although the GP capacity gap is pronounced. The Trowbridge area had the highest gap in provision in the Wiltshire CCG in September 2016 (-1,050m²). The gap is expected to increase to -1,215m² by 2026.

A **Bradford on Avon** there is an issue with GP capacity (-177m² in 2016), but this is expected to decrease by 2026. The main issue with any development in this settlement is that there is no existing primary and secondary school capacity in Bradford on Avon and limited scope to increase provision. Additionally, St Laurence Academy is currently serving residents of Trowbridge and additional housing in Bradford on Avon could increase demand for school places in Trowbridge.

Warminster requires a significant amount of development to address the secondary school capacity issues. In meeting the current demand, a site for a new school is looking to be secured as of Aug 2019. Primary provision is expected to be at capacity following military moves, with little ability to expand existing provision and additional provision is expected to be delivered through the West Urban Extension. Substantial levels of development would be needed to support a new secondary or primary school, in addition to limited site options. However, there is a small GP capacity gap for Warminster, which is expected to increase to -204m² by 2026.

Westbury is likely to require expansion of Matravers School to meet any new demands for up to 1000 additional homes, although there is some existing capacity at present. Primary schools in the area are also subject to some surplus capacity, but as these places are expected to be filled by known growth, additional primary provision is expected to be required in the near future. Therefore, a limited amount of growth could be accommodated in existing provision, but substantial additional housing would require new provision. With relation to the NHS, the local community hospital has closed and a small GP capacity gap is forecast for 2026 (-30m²).

DAQ 3: Promote/create public spaces and community facilities that might support public health, civic, cultural, recreational and community functions?

For this high-level stage of appraisal, it is difficult to make notable distinctions between the options in relation to public spaces and community facilities. It is assumed that these matters would not necessarily be directly affected by the strategic distribution of housing and so no conclusions on this aspect of the strategic objective have been made at this stage.

DAQ 4: Reduce rural isolation, including access to affordable services for those without a car in rural areas?

Rural areas suffer from lack of access to services and facilities, so focusing development in the Rest of the HMA areas without promoting services alongside could lead to more isolation. However, housing affordability is an issue in the Rest of the HMA therefore housing development in these areas can potentially address this issue.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Proportionately low levels of growth are proposed for Bradford on Avon. Low rates of development are not considered to be able to help overcome existing education and health service capacity issues. However, there should be benefits overall in terms of new jobs from 1ha employment provision, provision of some affordable housing for those on low incomes or living in inappropriate housing, new or expanded community/cultural/ recreational facilities and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Minor positive effects considered likely overall.	This strategy proposes proportionately low levels of growth for Bradford on Avon equivalent of the roll forward (TR-A). As with TR-A, low rates of development are not considered to be able to help overcome existing education and health service capacity issues. However, there should be benefits overall in terms of provision of affordable housing for those on low incomes or living in inappropriate housing, new or expanded community/cultural/ recreational facilities and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Minor positive effects considered likely overall.	This strategy proposes a significantly lower level of housing than TR-A and TR-B for Bradford on Avon. However, there should be some benefits overall in terms of provision of some affordable housing, new or expanded community/cultural/ recreational facilities and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Minor positive effects considered likely overall, but less than TR-A and TR-B.
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor positive

Trowbridge	<p>This level of housing growth at Trowbridge is comparatively higher than those proposed by the other strategies. No employment is proposed. This level of growth may place additional pressures on existing services and facilities – there is currently significant pressure on health and education facilities in the town. However, it should also have benefits in terms of provision of affordable housing and new or expanded education/community/cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Overall, moderate positive effects are considered likely.</p>	<p>This strategy proposes the lowest level of housing growth at Trowbridge and no employment is proposed. This level of growth may place additional pressures on existing services and facilities – there is currently significant pressure on health and education facilities in the town. However, it should also have benefits in terms of provision of affordable housing and new or expanded education/community/cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Overall, moderate positive effects are considered likely.</p>	<p>This level of housing growth at Trowbridge is comparatively higher than those proposed by the other strategies. No employment is proposed. This level of growth may place additional pressures on existing services and facilities – there is currently significant pressure on health and education facilities in the town. However, it should also have benefits in terms of provision of affordable housing and new or expanded education/community/cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Overall, moderate positive effects are considered likely.</p>
	Likely effects: moderate positive	Likely effects: moderate positive	Likely effects: moderate positive
Warminster	<p>Warminster requires a significant amount of development to address the secondary school capacity issues. This strategy, like all others, proposes a proportionately low level of growth. However, it should also have some benefits in terms of provision of affordable housing and new or expanded education/community/cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Overall, minor positive effects are considered likely.</p>	<p>Warminster requires a significant amount of development to address the secondary school capacity issues. This strategy, like all others, proposes a proportionately low level of growth. However, it should also have some benefits in terms of provision of affordable housing and new or expanded education/community/cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Overall, minor positive effects are considered likely.</p>	<p>Warminster requires a significant amount of development to address the secondary school capacity issues. This strategy, like all others, proposes a proportionately low level of growth. However, it should also have some benefits in terms of provision of affordable housing and new or expanded education/community/cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Overall, minor positive effects are considered likely.</p>
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor positive
Westbury	<p>Proportionately low levels of growth are proposed for Westbury. Development could help overcome issues of deprivation and an emerging GP capacity gap. School expansion/additional provision may be required to meet the needs of new development beyond 2026. This strategy, similar to TR-C, and with no employment, is unlikely to have significant benefits for this objective. However, it should have some benefits</p>	<p>Strategy TR-B proposes significantly higher levels of growth at Westbury proportionate to the settlement. Higher levels of development at Westbury could help overcome issues of deprivation and an emerging GP capacity gap. it should have significant benefits in terms of provision of affordable housing and new or expanded education/ community/cultural/ recreational facilities, and creation of</p>	<p>Proportionately low levels of growth are proposed for Westbury. Development could help overcome issues of deprivation and an emerging GP capacity gap. School expansion/additional provision may be required to meet the needs of new development beyond 2026. This strategy, similar to TR-A, and with no employment, is unlikely to have significant benefits for this objective. However, it should have some benefits in terms of</p>

	<p>in terms of provision of affordable housing and new or expanded education/ community/cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise.</p> <p>New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities.</p> <p>Overall, minor positive effects are considered likely.</p>	<p>new areas of public open space that could help reduce social isolation and allow physical exercise.</p> <p>New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities.</p> <p>Overall, moderate positive effects are considered likely.</p>	<p>provision of affordable housing and new or expanded education/ community/cultural/ recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise.</p> <p>New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities.</p> <p>Overall, minor positive effects are considered likely.</p>
	Likely effects: minor positive	Likely effects: moderate positive	Likely effects: minor positive
Rest of HMA	<p>There is an opportunity for growth in rural areas to lead to increased access to services and facilities, reducing rural isolation and some additional affordable housing, but there is a degree of uncertainty at this stage regarding the location of development.</p> <p>New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities, but benefits are not likely to be significant.</p> <p>Overall, minor positive effects are considered likely.</p>	<p>There is an opportunity for growth in rural areas to lead to increased access to services and facilities, reducing rural isolation and some additional affordable housing, but there is a degree of uncertainty at this stage regarding the location of development.</p> <p>This strategy proposes a higher level of growth than the roll forward. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities, but benefits are not likely to be significant.</p> <p>Overall, minor positive effects are considered likely.</p>	<p>This strategy proposes the highest level of growth when compared with the other strategies, and 1ha of employment provision. There is an opportunity for growth in rural areas to lead to increased access to services and facilities, reducing rural isolation and some additional affordable housing, but there is a degree of uncertainty at this stage regarding the location of development.</p> <p>This strategy has the largest amount of scope to lead to a positive effect on the Rest of the HMA.</p> <p>Overall, moderate positive effects are considered likely.</p>
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: moderate positive
Overall HMA score	1.2 Overall, it is likely that there will be minor positive effects on Objective 9.	1.4 Overall, it is likely that there will be minor positive effects on Objective 9.	1.4 Overall, it is likely that there will be minor positive effects on Objective 9.

Conclusions/Recommendations:

- Based on scores overall across all settlements/areas, all strategies are likely to have minor positive effects against this objective. However, **Strategies TR-B and TR-C are considered to be the most sustainable options** as they will lead to the greater number of benefits overall.
- **Strategy TR-A is considered to be the least sustainable option** as it will lead to fewer benefits overall.
- Strategies that distribute higher levels of growth to different areas e.g. TR-A to Trowbridge, TR-B to Westbury and TR-C to the Rest of the HMA are likely to have greater benefits. However, these levels of higher growth are distributed between all of the strategies which is why they score so similarly, and growth is not of a scale where significant changes are likely to occur in any area. There are opportunities within all strategies to support and improve the health and wellbeing of communities, reduce poverty and deprivation and lead to more inclusive communities.

- At Trowbridge, all strategies have relatively high development focused on the town, which means all strategies promote development which is likely to benefit from good access to the services/facilities that Trowbridge offers and could help support areas of deprivation. Significant benefits are likely for all strategies, although no employment provision is proposed which would increase benefits against this objective. At this stage, evidence suggests that new secondary school provision can be supported by higher levels of growth in Trowbridge or Westbury. Strategies TR-A and TR-C are more capable of supporting a new school at Trowbridge.
- Strategies should take the opportunity to invest in health services and facilities, where possible. This is particularly important in the Trowbridge area as there is a substantial GP capacity gap.
- At Bradford on Avon, the low rates of development proposed for all strategies are not considered to be able to help overcome existing education and health service capacity issues. However, there should be benefits overall and TR-A proposes a small amount of employment provision. For significant benefits to occur at the town, however, a significantly higher level of growth, both housing and employment, would need to be allocated.
- Strategy TR-B proposes the highest level of growth at Westbury, and this strategy is considered to be the only strategy likely to have significant benefits and also capable of supporting new secondary school provision at the town. Development in Westbury is likely to require the expansion of the existing secondary school and there are limited opportunities to do this, although there is some existing surplus capacity. This level of development could help overcome issues of deprivation and an emerging GP capacity gap. School expansion/additional provision is likely to be required to meet the needs of new development beyond 2026.
- Warminster requires a significant amount of development to address school capacity issues, although no strategy facilitates this as they all propose low levels of growth. In order to achieve greater benefits against this objective, growth rates at Warminster would need to be significantly higher for all strategies.
- Development in the Rest of the HMA, where higher levels are proposed through Strategy TR-C, is considered to have significant benefits on this objective. There is an opportunity for growth in rural areas to lead to increased access to services and facilities, reducing rural isolation and some additional affordable housing, but there is a degree of uncertainty at this stage regarding the location of development. TR-C has the greatest scope to lead to benefits for rural communities.
- Increasing levels of growth in all settlements/areas, providing there is commensurate investment in infrastructure, services and facilities, is likely to have a positive effect on this objective. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities
- New development in different parts of the HMA is considered to be positive overall, through provision of affordable housing and new or expanded health, education, cultural and recreational facilities, and creation of new areas of public open space that could help reduce social isolation and allow physical exercise.
- New development can cause pressure on existing services and facilities in the short-term and needs to be accompanied by adequate infrastructure to meet the needs of new residents. This is especially the case regarding transport, healthcare and education where services are under pressure across much of the area. Additional primary and secondary school capacity would need to be found at all of the settlements. Increasing the levels of growth proposed could enable new educational facility supply but could also lead to pressure on other services.
- For new development to be effective in reducing poverty and deprivation and promoting more inclusive communities, it will be very important that all new housing development includes a range of house types/tenures and a level of affordable housing that will actually help reduce the affordability ratio, which is particularly high in Bradford on Avon and in the rural parts of the HMA. All new development should provide the essential services and facilities that are needed to avoid increasing pressure on existing services and also reduces the need to travel and reduces out-commuting.

Sustainability Appraisal Objective 10: Reduce the need to travel and promote more sustainable transport choices

Decision-Aiding Question (DAQ) 1: Promote mixed use developments, in accessible locations, that reduce the need to travel and reliance on the private car?

Limited notable observations are possible at this stage in relation to this DAQ. Further consideration will be given to these matters at a later, more site specific, stage where more precise accessibility, development mix and travel options become clearer. Where observations can be made at this strategic stage, they have been made below.

Each of the main settlements within this HMA possess both a rail link and bus travel options as alternatives to private car travel. When looking at the rest of the HMA, many of these locations are positioned in less accessible locations than the market towns and principal settlements and may increase the reliance on the private car, often being positioned further away from many amenities or public transport services.

DAQ 2: Provide suitable access and not significantly exacerbate issues of local transport capacity (unless there is evidence that such impacts can be mitigated)?

The below observations provide a brief strategic overview of certain key strategic constraints at each location. At this stage of appraisal, it is difficult to make notable observations on the precise suitability of access along with the impacts on local transport capacity. More detailed assessment will be possible at the site assessment stage where impacts along with mitigation/improvement measures will become clearer.

Bradford on Avon hosts a largely historic road layout offering some narrow roads with a single river crossing for the A363. These factors can lead to congestion at peak periods. Mitigation measures to combat this appear to be limited at this stage.

The highway network within **Trowbridge** suffers from peak hour congestion in the town centre and into key destinations. In terms of known likely mitigation, a Trowbridge Transport Strategy has been developed that highlights key junction improvements within Trowbridge and along the A350.

Within **Warminster** pressure currently exists on east to west routes via Warminster town centre as only two routes currently facilitate this internal movement. This pressure is also elevated by the town centres linear high street, resulting in cross-town traffic problems. AM and PM peak hour delays also occur on the B3414 High Street / Market Place and Station Road impacting travel time reliability.

Westbury's main transport link is comprised of the A350 which suffers from peak time congestion on its route through the town centre causing local social and environmental impacts. Peak hour delays on the A350 and into key destinations can impact travel time reliability.

Within the **Rest of the HMA**, links to the highway network vary as do the levels of existing transport capacity. That being said, the majority of settlements in the rest of HMA will likely be less accessible to services and increase the likelihood of increasing usage of transport corridors with lower levels of capacity.

DAQ 3: Make efficient use of existing transport infrastructure?

The below observations provide a brief strategic overview of certain elements of the existing transport infrastructure in each broad location that could be utilised sustainably if growth were to take place. At this stage of appraisal, it is difficult to make notable observations on the precise potential efficient use or impacts upon the existing transport infrastructure. More detailed assessment will be possible at the site assessment stage where the potential for utilisation or improvements to the existing transport infrastructure will become clearer.

Highway accessibility within **Bradford on Avon** mainly lies with the A363 running through the town providing links to surrounding settlements and linkages to the A4 and A350. A number of radial B roads also connect the town to other surrounding settlements. Rail and bus options, depending on the location of development, could offer suitable alternatives to private car travel.

Trowbridge, in highway terms, provides accessibility to the wider transport network via the A350 and the A361. Rail and bus options, depending on the location of development, could offer suitable alternatives to private car travel.

Warminster lies on the A36 / A350 providing direct links to west Wiltshire, Bath, Salisbury and the south coast. The A36 provides a bypass for Warminster and alleviates the majority of through traffic while most of the town is subject to a 7.5 tonne weight restriction. Rail and bus services offer opportunities to provide alternatives to private car travel.

Accessibility in **Westbury** largely lies with the A350 primary route. Rail and bus services offer opportunities to provide alternatives to private car travel.

The often rural nature of the **Rest of the HMA** leads to a large variance in the nature and availability of transport infrastructure, both in public transport and highway terms. Existing sustainable transport infrastructure in the rest of the HMA is often limited due to the remote location of certain areas with infrequent public transport services and accessibility. Efficient use of existing transport systems in these locations is consequently more likely to be constrained by the lack of current infrastructure.

DAQ 4: Provide the opportunity to create additional sustainable transport infrastructure including safe active travel?

The below observations provide a brief strategic overview of the existing sustainable transport provision and pedestrian environment in each broad location that provide opportunity for enhancement moving forward. At this stage of appraisal, it is difficult to make notable observations on the precise opportunities to enhance safe active travel without knowing the spatial distribution of growth within each location. More detailed assessment should be possible at the site assessment stage where the opportunities to create additional sustainable transport infrastructure will become clearer.

Bradford on Avon hosts rail and bus services that are well utilised which is reflected by the comparatively high modal share of rail usage in the community area and the commercially strong 265 bus service. These services, namely those to outlying settlements, can be limited unless they lie on key routes while rail services don't connect directly to Chippenham or Swindon. This highlights a couple of areas that could, depending on the viability of such measures, provide future opportunities. In terms of active travel, the volume of traffic together with the narrow streets and footways can provide for a less appealing pedestrian environment. This in combination with the historic fabric of the town, hilly topography and environmental constraints (River Avon, Kennet and Avon Canal and railway line) may reduce the number of opportunities to enhance the active travel options within the town. Opportunities that do exist include; the Wiltshire Cycleway (on road leisure route); the cycle route along the A363 between Bradford on Avon and Trowbridge; National Cycle Network route 4 following the Kennet and Avon Canal Towpath.

Existing sustainable transport services within **Trowbridge** include bus links to locations within and outside of the town and the railway station offering links, including trans Wiltshire links. Both the bus and rail service provide opportunity to further enhance sustainable transport usage into the future. Pedestrian links include National Cycle Network route 4 which passes through Trowbridge along the Kennet and Avon canal tow path with further opportunities being outlined within the Trowbridge Town Cycle Network plan.

Enhancing sustainable transport options in **Warminster** include options to enhance the bus routes, already offering services to west Wiltshire, Bath and Salisbury along with the town bus service linking those areas lying away from the inter-urban routes. Similarly, Warminster rail station provides good connectivity within and beyond the county. From a pedestrian perspective National Cycle Network route 24 passes through the south area of the town comprising a mixture of on-road routes, quieter roads, rights of way and permissive routes. The Warminster Town Cycle Network plan focuses on the town and extends to most areas and urban extensions.

Westbury hosts bus links from most of the residential areas to the town centre and surrounding settlements while also acts as a significant rail hub. This railway link is situated about 1.3km from the town centre and bus network connectivity to this service could be improved, both of which offer opportunities for enhancement of the public transport offer in Westbury. The pedestrian environment in Westbury is impacted upon by the A350 and Station Road which provide a poor walking and cycling environment. The severance caused by the Westbury Avoiding Line (rail route) and the rail routes through the station result in poor connectivity between the residential parts of Westbury and the major business sites. The Westbury Town Cycle Network plan focuses on the town and highlights opportunities.

Within the **Rest of the HMA** there is relatively poor cycle network provision in the rural hinterland and while settlements are connected by Public Rights of Way, the quality and visibility of these routes vary. The bus services are often limited or in-frequent, particularly in more sparsely populated rural areas, though it is acknowledged that growth of towns and villages may offer the opportunity to make some public transport services more viable to these areas.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	TR-A is one of the strategies directing comparatively more housing growth to Bradford on Avon (although still proportionately low) along with 1ha employment.	TR-B is one of the strategies directing comparatively more housing growth to Bradford on Avon (although still proportionately low). This level of development is assessed	TR-C directs proportionately and comparatively low levels of housing growth to Bradford on Avon. TR-C directs proportionately and comparatively low levels of

	This level of development is assessed as having a likely minor adverse effect against this objective with mitigation to alleviate further congestion and the ability to maximise active travel appearing more complex at this stage.	as having a likely minor adverse effect against this objective with mitigation to alleviate further congestion and the ability to maximise active travel appearing more complex at this stage.	housing growth to Bradford on Avon. Given the low figure this level of development is assessed as having a likely neutral effect against this objective at this stage.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: neutral
Trowbridge	Focusing development at Trowbridge may take advantage of key sustainable transport services, however given Trowbridge town centre suffers from peak time delays the subsequent impact this level of development may have on congestion and subsequently both private and public transport must be considered. Given the level of growth is relatively high and the mitigation measures remain unclear at this stage, this location for growth is currently assessed as having a moderate adverse effect against this objective.	Proportionately less growth is focussed on Trowbridge however the figure remains relatively high. Focusing this level of development here may take advantage of key services however given Trowbridge town centre suffers from peak time delays the subsequent impact this level of development may have on congestion and subsequently both private and public transport must be considered. With mitigation and likely effects of this level of growth remaining unclear, this location for growth is currently assessed as having a moderate adverse effect against this objective.	Focusing this proportionately moderate level of growth at Trowbridge may take advantage of key sustainable transport services, however given Trowbridge town centre suffers from peak time delays the subsequent impact this level of development may have on congestion and subsequently both private and public transport must be considered. Given the mitigation measures remain unclear at this stage, this location for growth is currently assessed as having a moderate adverse effect against this objective.
	Likely effects: moderate adverse	Likely effects: moderate adverse	Likely effects: moderate adverse
Warminster	At Warminster this strategy effectively ties growth to the current level of commitments. Growth at this proportionately low level is assessed as having a likely minor adverse effect against this objective.	While marginally higher, a proportionately low level of growth is proposed at Warminster. Growth at this proportionately low level is assessed as having a likely minor adverse effect against this objective.	At Warminster this strategy effectively ties growth to the current level of commitments. Growth at this proportionately low level is assessed as having a likely minor adverse effect against this objective.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: minor adverse
Westbury	At Westbury this proportionately lower level of development is currently assessed as having a minor adverse effect against this objective given the ability to mitigate additional congestion and maximise sustainable transport usage is currently unknown.	The higher level of proportionate growth being focussed on Westbury is currently assessed as having a moderate adverse effect given the extent to which mitigation can combat additional congestion and maximise sustainability is currently unknown. It is acknowledged that employment growth is also suggested under this strategy for Westbury, while it could be argued this may provide an opportunity to increase self-containment and reduce out-commuting, precise assessment of this effect is not yet possible.	At Westbury this proportionately lower level of development is currently assessed as having a minor adverse effect against this objective given the ability to mitigate additional congestion and maximise sustainable transport usage is currently unknown.
	Likely effects: minor adverse	Likely effects: moderate adverse	Likely effects: minor adverse
Rest of HMA	A continuation of the current levels of growth in the rest of HMA may place growth in locations with reduced access to sustainable modes of transport. For development to mitigate this effect it would need to improve the availability of sustainable transport provision and accessibility. Given the extent to which this is possible remains unclear at this stage. This	While relatively low growth continues to be identified for the rest of HMA, growth in these locations may place development in locations with reduced access to sustainable modes of transport. For development to mitigate this effect it would need to improve the availability of sustainable transport provision and accessibility.	Focusing a higher level of growth, both housing and employment, in rest of HMA may place development in locations with reduced access to sustainable modes of transport. For development to mitigate this effect it would need to improve the availability of sustainable transport provision and accessibility. This relatively moderate level of growth in combination with the uncertainty over the

	level of growth in the Rest of HMA is assessed as having a minor adverse effect against this objective.	Given the extent to which this is possible remains unclear at this stage. This level of growth in the Rest of HMA is assessed as having a minor adverse effect against this objective.	geographical location of growth and the level to which sustainability may be achieved means this level of growth in these locations is currently assessed as having a moderate adverse effect against this objective.
	Likely effects: minor adverse	Likely effects: minor adverse	Likely effects: moderate adverse
Overall HMA score	-1.2 Overall, it is likely that there will be minor adverse effects on this objective – similar to Strategy TR-C.	-1.4 Overall, it is likely that there will be minor adverse effects on this objective, although adverse effects will be greater than the other two strategies due to likely significant effects at Trowbridge and Westbury under this strategy	-1.2 Overall, it is likely that there will be minor adverse effects on this objective - similar to Strategy TR-A.

Conclusions/Recommendations:

- Whilst all strategies are considered likely to have minor adverse effects overall, based on scores across all settlements/areas, **Strategies TR-A and TR-C score equally and are considered the most sustainable strategies** against this objective. Both strategies are considered likely to have fewer adverse effects than strategy TR-B.
- **Strategy TR-B is considered the least sustainable option** as it is considered to have greater adverse effects overall – this is due to the likelihood of significant adverse effects at Trowbridge and Westbury.
- Transport issues within the Trowbridge HMA are largely focussed on trying to maximise the use and availability of sustainable modes of transport along with managing levels of congestion on strategic routes and in town centres. This can impact upon private and public transport, as well as impacting the strategic role of key routes running through each location. Overall, the level of growth proposed across the strategies is considered likely to increase traffic levels generally, and the impact of this must be taken into consideration when considering options moving forward.
- Trowbridge - has been identified as having a relatively high level of growth across all the strategies. As has been highlighted, Trowbridge benefits from good strategic transport links along with access to a wide range of sustainable transport services. While it is beneficial to locate development in such locations, the significance of effect for all strategies is reflective of the level of risk that comes with this level of growth in a town that has been identified as suffering from peak time congestion on some key strategic routes. Likely effects are somewhat uncertain given the acknowledgment that mitigation could manage this level of growth to ensure congestion is managed and sustainability maximised. Equally the uncertainty reflects that assessment is likely to change once further detail emerges around the sustainability of development in transport terms and the mitigation possible that may vary in different locations.
- Westbury – proposed growth varies significantly in Strategy TR-B which is considerably higher than the other strategies. Westbury is located on the A350 primary route which passes through the town centre causing delays on the current road layout. While bus and rail services are available, this congestion can impact on both private and public transport provision. The options identifying proportionately lower levels of growth at Westbury, namely TR-A and TR-C, while having a lower assessed impact against this objective, may preclude the viability of highway improvement measures that can sometimes come with larger levels of growth. Similarly, while the impact of the relatively higher level of growth identified in TR-B has been identified as significant, this is associated with the risk that comes with this level of development to a town struggling with congestion on a primary route. This uncertainty reflects that the assessment is likely to change once further detail emerges around the sustainability of development in transport terms and the mitigation possible that can vary in different locations with differing levels of development.
- Bradford on Avon - is identified as having congestion problems on the A363 with the historic fabric of the town, its hilly topography and environmental constraints not only precluding clear road infrastructure mitigation but also restricting active travel connectivity. Although bus and rail services offer sustainable transport options within the town. With these factors in mind, and the impact further development may have on; the road network; the reliability of sustainable transport; and the poor pedestrian environment, the levels of development suggested within strategies TR-A and TR-B are currently assessed as having likely negative effects. The low level of development in association with the sustainable transport options available offer the opportunity to manage impacts through sustainability methods. However, the impact on the restricted road network would need to be carefully monitored.

- Low levels of growth are proposed at Warminster across all the options. Warminster presents good public transport provision by rail and bus. Growth at this level is unlikely to have significant impacts however it will need to be monitored against the risk factors present including town centre and peak hour traffic congestion effecting private and public transport.
- While growth in the Rest of the HMA, with higher levels in strategy TR-C, places development away from established sustainable transport provision, development here may facilitate and improve the viability of new sustainable transport options reaching more rural communities. At this stage, development in these locations has been assessed negatively against this objective (moderately so at higher levels) mainly due to the likelihood that it will not make efficient use of existing sustainable transport infrastructure and may increase private car usage. However further work establishing the level of development required in certain locations to facilitate investment and improvements in sustainable transport options may change this assessment and clarify the sustainability of the rest of HMA, hence some uncertainty regarding the assessments at this stage.
- It is considered key to locate development at locations that make efficient use of existing transport infrastructure and can facilitate advancements in the use of sustainable transport. Therefore, favourable locations should be in well-connected areas that benefit from good accessibility to a wide range of sustainable transport options, or in locations that can facilitate improvements in such factors. Significant new highway infrastructure may be necessary in Bradford on Avon, Trowbridge, Warminster and Westbury along with the rest of the HMA if certain levels of growth are seen.
- Development should contribute to improving sustainable transport networks; this includes linking town centres with development sites as well as linking settlements together. Strong investment may be required to improve public transport services and safe walking/cycling links, particularly within the town centres.
- Mixed-use development proposals are recommended as this will help increase self-containment and reduce need to travel.
- More detailed transport assessments may be necessary to understand in detail the impact of certain levels of development on settlements and communities to understand the impacts and possible mitigation measures that can be put in place to improve congestion hot spots and sustainable transport provision.

Sustainability Appraisal Objective 11: Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth

Decision-Aiding Question (DAQ) 1: Support the vitality and viability of town centres (proximity to town centres, built up areas, station hub)?

The relationship with the town centre, and its immediate and wider rural context, is complex and will also rely on trade from retail and non-retail businesses. Additional growth will inevitably contribute, to some extent, to the vitality and viability of town centres. At this stage, in the absence of specific site options to consider, the proximity of future housing and employment development to the town centres cannot be determined and therefore will not be considered as part of this high-level assessment but will be assessed at later stages.

DAQ 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?

The Local Plan Review is at an early stage of preparation and, consequently, details of the distribution and range of employment uses that will be provided is not known. Therefore, for this high-level stage of appraisal it is difficult to make notable distinctions between the options against this objective. It is assumed that these matters would not necessarily be affected by the strategic distribution of employment land and so no conclusions on this aspect of the strategic objective have been made at this stage.

DAQ 3: Contribute to the provision of infrastructure that will help to promote economic growth?

The provision of housing and employment will require sufficient infrastructure to be in place to ensure that it is acceptable. This will largely be achieved through s106 contributions for those directly related to the development. CIL funds and grant funding will ensure the provision of strategic infrastructure. The quantum of homes and employment land to be delivered is the same for each of the strategies and therefore should result in the contributions towards infrastructure on a similar scale, albeit applicable to specific areas. The provision of infrastructure will need to be considered and tested further at the site options stage.

DAQ 4: Promote a balance between residential and employment development to help reduce travel distances to work?

Wiltshire has large flows of commuters into and out of the county, with an overall net outflow of commuters. The majority of movement is to and from Swindon and Bath & North-East Somerset. 56% of people travel to work by car, 13% by foot and 5% by public transport. Self-containment in Wiltshire is 63%, compared to 74% in Swindon.

The extent that strategies can promote a balance between residential and employment development will, in part, depend on the existing provision in terms of housing stock and employment uses, the relationship between them, and the relationship/connectivity of a settlement with other parts of the HMA/FEMA (which themselves are strongly influenced by travel to work areas) and adjacent areas. The provision of employment development in isolation could, for example, be more likely to lead to an increase in travel distances but not necessarily if it was located in an area of relatively higher rates of unemployment. The same might apply in areas where employment vacancies are high, or jobs are expected to increase. This will, however, depend on the extent that the skills base of the unemployed in the local area match that provided by any new employers.

Of the total need of 182ha of employment land identified in the FEMA, a substantial proportion can be met from existing operational employment sites and site allocations leaving 26ha to be met from additional allocations across the county. The residual requirement for employment land for the Trowbridge HMA is 1ha. Due to the extent of existing employment provision, none of the three strategies would be likely to result in major positive or negative effects, as the vast majority is already being met by current employment sites or existing commitments.

Employment allocations are often subject to speculative housing applications and therefore at risk of loss during the plan period.

At **Trowbridge** total employment has steadily declined since 2009. There is a high concentration of jobs in public administration & defence. A lack of employment development is highlighted in the JSF profile. Recent investments include the St Stephen's Place leisure/food/retail developments, the new HQ offices for Hitachi CVS, and Apetito's programme at Canal Road. White Horse Business Park is again nearing full occupancy, with only one undeveloped plot. The Functional Economic Market Area Assessment states that there is a net additional sq m floor space requirement of approx. 30,000m² for (A1), 980 (A2) and 9,200m² (A3-5) within the A350 FEMA for 2016-36. The study anticipates this growth is accommodated primarily at town centres. With Trowbridge the largest town centre, and a higher number of shop vacancies compared with other Wiltshire market towns, findings support a need for additional town centre comparison goods retail investment. There is a very limited supply of employment sites and premises available in Trowbridge to accommodate economic growth potential.

At **Bradford on Avon** the total number of jobs jumped significantly in 2014-15, having previously stagnated. There is a high concentration of jobs in accommodation & food services, as reflected in the JSF. 2017 saw the construction of a new HQ and production facility for R&D-led automotive business Anthony Best Dynamics as part of the Kingston Farm mixed-use development. There is a low level of unemployment at the town. There are currently limited alternative employment sites available for businesses to locate or existing businesses to expand.

At **Westbury** total employment has stagnated since 2009. There is a high concentration of jobs in transportation & storage, and noticeable concentrations in manufacturing and construction. Welton Bibby & Baron have invested significantly at their WWTE site following relocation to the area. There has been significant investment into Hawke Ridge Business Park, located next to the A350 between Westbury and Trowbridge. There is a low level of unemployment at the town.

At **Warminster**, total employment has stagnated since 2009. There is a noticeable concentration of jobs in education, health & social work, and manufacturing. Planning permission to deliver several new business starter and industrial units was granted on Warminster Business Park last year, which would see the creation of over 40,000 sq ft of new B use space in the town. The town has low levels of unemployment but there is a very limited supply of employment sites and premises available in Warminster.

Settlement/ Area	Strategy TR – A (Current Strategy)	Strategy TR – B (Westbury Growth Point)	Strategy TR – C (Greater Rural Focus)
Bradford on Avon	Under this strategy 1ha of additional employment land would be allocated at Bradford on Avon. The additional employment land available for new and expanding businesses is limited in scale but this would be consistent with constraints and the relatively low level of additional homes being proposed for the town.	Under this strategy no additional employment land would be allocated at Bradford on Avon. Due to the small number of homes allocated to the town the effects of this strategy are likely to be positive for the town. The small amount of housing proposed will help to support local businesses, the town centre and provide an increased supply of local labour.	Under this strategy no additional employment land would be allocated at Bradford on Avon. Due to the small number of homes allocated to the town the effects of this strategy are likely to be positive. The small amount of housing proposed will help to support local businesses, the town centre and provide an increased supply of local labour.

	<p>The affordability ratio for housing is high for BoA so the resultant effect would, to some extent, be dependent on the type of employment delivered i.e. whether the employees could afford to live near to where they work. Consequently, this strategy is predicted to result in a minor positive effect on travel to work distances.</p> <p>The small amount of housing proposed will help to support local businesses, the town centre and provide an increased supply of local labour.</p> <p>TR-A is likely to have minor positive effects overall.</p>	<p>Overall this strategy is predicted to result in minor positive effects at the town.</p>	<p>Overall this strategy is predicted to result in minor positive effects at the town. However, these benefits will be less than for TR-A and TR-B.</p>
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor positive
Trowbridge	<p>Under this strategy no additional employment land would be required at Trowbridge, the same as for TR-B and TR-C. Given the outstanding residual requirement of only 1ha across the HMA, the supply of outstanding and existing commitments is likely to be sufficient to balance the housing growth proposed against this strategy. This would, however, depend on existing commitments being retained and delivered.</p> <p>The significantly increased level of housing under this strategy will help to support local businesses, the town centre and provide a significantly increased supply of local labour.</p> <p>Overall, even though no additional employment is proposed, major positive effects are likely from this level of housing growth at the town.</p>	<p>Under this strategy no additional employment land would be required at Trowbridge, the same as for TR-A and TR-C. Given the outstanding residual requirement of only 1ha across the HMA, the supply of outstanding and existing commitments is likely to be sufficient to balance the housing growth proposed against this strategy. This would, however, depend on existing commitments being retained and delivered.</p> <p>The significantly lower level of housing under this strategy will still help to support local businesses, the town centre and provide an increased supply of local labour. However, benefits will not be as significant as for TR-A and TR-C.</p> <p>Overall, moderate positive effects are likely from this level of growth.</p>	<p>Under this strategy no additional employment land would be required at Trowbridge, the same as for TR-A and TR-B. Given the outstanding residual requirement of only 1ha across the HMA, the supply of outstanding and existing commitments is likely to be sufficient to balance the housing growth proposed against this strategy. This would, however, depend on existing commitments being retained and delivered.</p> <p>The housing allocation for this strategy is marginally lower than for TR-A but higher than TR-B. The level of housing under this strategy will help to support local businesses, the town centre and provide an increased supply of local labour. However, benefits will not be as significant as for TR-A.</p> <p>Overall, moderate positive effects are likely from this level of growth</p>
	Likely effects: major positive	Likely effects: moderate positive	Likely effects: moderate positive
Warminster	<p>At Warminster no additional employment land would be allocated at the town. However, it is assumed that existing commitments would be broadly sufficient to provide balanced growth for the town.</p> <p>The relatively small amount of housing under this strategy will help to support local businesses, the town centre and provide an increased supply of local labour.</p> <p>Providing that existing commitments are delivered for employment uses, this strategy would be likely to lead to minor positive effects on this objective.</p>	<p>At Warminster no additional employment land would be allocated at the town. However, it is assumed that existing commitments would be broadly sufficient to provide balanced growth for the town.</p> <p>The relatively small amount of housing under this strategy which is a slight increase over TR-A and TR-C will help to support local businesses, the town centre and provide an increased supply of local labour.</p> <p>Providing that existing commitments are delivered for employment uses, this strategy would be likely to lead to minor positive effects on this objective.</p>	<p>At Warminster no additional employment land would be allocated at the town. However, it is assumed that existing commitments would be broadly sufficient to provide balanced growth for the town.</p> <p>The relatively small amount of housing under this strategy, the same as TR-A, will help to support local businesses, the town centre and provide an increased supply of local labour.</p> <p>Providing that existing commitments are delivered for employment uses, this strategy would be likely to lead to minor positive effects on this objective.</p>
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor positive

Westbury	<p>Under this strategy there would be no additional employment land allocated at Westbury. Whilst there is a relatively low housing requirement, it is assumed (from the FEMA evidence) that existing commitments would be broadly sufficient to meet local employment needs for Westbury.</p> <p>The relatively low level of housing under this strategy will still help to support local businesses, the town centre and provide an increased supply of local labour.</p> <p>It is predicted that this strategy would have minor positive effects for the town.</p>	<p>Under this strategy there would be 1ha additional employment land allocated at Westbury but also a significantly higher level of housing compared to Strategies TR-A and TR-C. Although this represents the largest allocation of employment of the three strategies it is relatively small scale for a town the size of Westbury.</p> <p>The higher number of homes under this strategy will significantly help to support local businesses, the town centre and provide an increased supply of local labour. Overall, moderate positive effects are considered likely against this objective.</p>	<p>Under this strategy there would be no additional employment land allocated at Westbury. Whilst there is a relatively low housing requirement, it is assumed (from the FEMA evidence) that existing commitments would be broadly sufficient to meet local employment needs for Westbury.</p> <p>The relatively low level of housing under this strategy which is a slight increase over TR-A will still help to support local businesses, the town centre and provide an increased supply of local labour.</p> <p>It is predicted that this strategy would have minor positive effects for the town.</p>
	Likely effects: minor positive	Likely effects: moderate positive	Likely effects: minor positive
Rest of HMA	<p>Under this strategy no employment land would be allocated for the rest of the HMA. This would mean a continuation of the existing approach to the provision of employment land to meet local needs in rural areas.</p> <p>The relatively low level of housing under this strategy will help to support local businesses, village services and facilities and provide an increased supply of local labour for local businesses.</p> <p>It is likely that this strategy will have minor positive effects.</p>	<p>Under this strategy no employment land would be allocated for the rest of the HMA. This would mean a continuation of the existing approach to the provision of employment land to meet local needs in rural areas.</p> <p>The higher level of housing under this strategy will help to support local businesses, village services and facilities and provide an increased supply of local labour for local businesses.</p> <p>It is likely that this strategy will have minor positive effects.</p>	<p>Under this strategy 1ha of employment land would be allocated for the rest of the HMA. This would mean an increase in the existing provision of employment land to balance the allocation of additional homes under this strategy.</p> <p>The significantly higher level of housing under this strategy will help to support local businesses, village services and facilities and provide an increased supply of local labour for local businesses.</p> <p>However, given that the benefits of this increased growth will be spread out across a wide rural area, benefits are not expected to be significant and this strategy is also likely to have minor positive effects.</p>
	Likely effects: minor positive	Likely effects: minor positive	Likely effects: minor positive
Overall HMA score	1.4 Overall, it is likely that there will be minor positive effects on this objective.	1.4 Overall, it is likely that there will be minor positive effects on this objective	1.2 Overall, it is likely that there will be minor positive effects on this objective.

Conclusions/Recommendations:

- Overall, **Strategies TR-A and TR-B score equally and are the most sustainable strategies** as they are likely to have the highest level of benefits across all areas.
- **Strategy TR-C is considered the least sustainable option** as it is likely to have fewer benefits across all areas.
- All strategies are likely to have positive effects overall. However, the focus of growth at Trowbridge under TR-A and the focus of growth at Westbury under TR-B are likely to increase the benefits when compared with TR-C. Strategy TR-A directs the employment requirement to where it would be more likely to have a positive effect, i.e. the smaller settlement of Bradford on Avon.

- Outstanding commitments in the Trowbridge HMA are capable of meeting a significant proportion of the need for additional employment land to 2036. Consequently, the differences in the effects of the three strategic options for the distribution of the employment land requirement are limited by the relatively small scale of development (1ha) under consideration.
- The rural focus of growth under TR-C will have benefits for rural areas, but because these will be spread out across a wide rural area, benefits are not expected to be significant. TR-C seeks to balance the additional homes proposed for the rural parts of the HMA which is considered positive, subject to being delivered in suitable locations in line with provision of homes.
- Given the amount of housing allocated to Trowbridge under all strategies, significant benefits are considered likely for all strategies, despite no allocation of employment land. This is because the significant level of housing will help to support local businesses, the town centre and provide an increased supply of local labour.
- The only other strategy considered likely to have significant benefits at a particular place is TR-B for Westbury which makes some employment provision and a significant increase in the level of housing.
- Outstanding commitments in the Trowbridge HMA are capable of meeting a significant proportion of the need for additional employment land to 2036. Consequently, the differences in the effects of the three strategic options for the distribution of the employment land requirement are limited by the relatively small scale of development (1ha) under consideration.
- Settlements/areas that combine a higher level of both employment and housing are considered likely to give greater benefits against this objective as both elements help to improve self-containment of settlements and encourage vibrant and diversified places.
- Retention of existing and allocated employment land is often challenging to manage. Consider inclusion of policies that safeguard against incompatible uses or unnecessary loss of employment sites but also set out criteria against which, in exceptional cases, an existing site or allocation that is clearly and demonstrably no longer suitable for employment development can be de-allocated or developed for an alternative use.
- Although there is limited requirement for employment land, it is possible that site allocations for the HMA may be suitable for mixed use development that could result in more than 1ha of additional employment land being identified. Whilst this would increase the options available for businesses looking to expand or relocate in Wiltshire, it could also lead to unintended loss or non-delivery of sustainable employment land elsewhere. This will need to be monitored and taken into consideration during plan preparation.

SA Annex 1.4 - Trowbridge Housing Market Area (HMA) - Assessment of Emerging Spatial Strategy 2016 – 2036 (Reg 18)

Settlement/area	Emerging Spatial Strategy (Reg 18)	
	Housing	Employment (ha)
Bradford on Avon	350	0
Trowbridge	5830	0
Warminster	2050	0
Westbury	1820	1
Rest of HMA	950	0
TOTAL	11000	1

Sustainability Appraisal Objective 1: Protect and enhance all biodiversity and geological features and avoid irreversible losses	
Decision-Aiding Questions (DAQ)	
1. Avoid potential negative impacts of development on designated wildlife sites, protected species and priority species and habitats (international, national, local) and enhance these where possible? 2. Ensure that all new developments protect Local Geological Sites (LGSs) from development? 3. Aid in the delivery of a network of multifunctional Green Infrastructure?	
Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above. Likely effects: minor adverse
Trowbridge	Overall effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above. Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above. Likely effects: moderate adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above. Likely effects: moderate adverse
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above. Likely effects: minor adverse
Overall score: -1.6 moderate adverse effects	

Conclusions/Recommendations: Moderate adverse effects likely overall for this emerging strategy. The areas considered most likely to experience significant adverse effects against this objective are Trowbridge, Warminster and Westbury.

Sustainability Appraisal Objective 2: Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings

Decision-Aiding Questions (DAQ)

1. Ensure efficient use of land? 2. Lead to the reuse of Previously Developed Land where possible/appropriate? 3. Encourage remediation of contaminated land? If so, would this lead to issues of viability and deliverability? 4. Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)? 5. Lead to the sterilisation of viable mineral resources? If so, is there potential to extract the mineral resource as part of the development?

Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above. Likely effects: minor adverse
Trowbridge	Overall effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above. Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above. Likely effects: moderate adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above. Likely effects: moderate adverse
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above. Likely effects: minor adverse
Overall score: -1.6 moderate adverse effects	

Conclusions/Recommendations: Moderate adverse effects likely overall for this emerging strategy. The areas considered most likely to experience significant adverse effects against this objective are Trowbridge, Warminster and Westbury.

Sustainability Appraisal Objective 3: Use and manage water resources in a sustainable manner

Decision-Aiding Questions (DAQ)

1. Protect surface, ground and drinking water quality? 2. Direct development to sites where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?

Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above.

	Likely effects: minor adverse
Trowbridge	Overall effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above.
	Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above.
	Likely effects: moderate adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above.
	Likely effects: moderate adverse
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above.
	Likely effects: minor adverse
Overall score: -1.6 moderate adverse effects	
Conclusions/Recommendations: Moderate adverse effects likely overall for this emerging strategy. The areas considered most likely to experience significant adverse effects against this objective are Trowbridge, Warminster and Westbury.	

Sustainability Appraisal Objective 4: Improve air quality and minimise all sources of environmental pollution

Decision-Aiding Questions (DAQ)

1. Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration? 2. Minimise effects on and where possible improve air quality and locate sensitive development away from areas of poor air quality (such as AQMAs)? 3. Lie within a consultation risk zone for a major hazard site or hazardous installation?

Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above.
	Likely effects: minor adverse
Trowbridge	Overall effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above.
	Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above.
	Likely effects: minor adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above.
	Likely effects: moderate adverse
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above.
	Likely effects: minor adverse
Overall score: -1.4 minor adverse effects	

Conclusions/Recommendations: Minor adverse effects likely overall for this emerging strategy. The areas considered most likely to experience significant adverse effects against this objective are Trowbridge and Westbury.

Sustainability Appraisal Objective 5: Minimise impacts on climate change (mitigation) and reduce vulnerability to future climate change effects (adaptation)).

Decision-Aiding Questions (DAQ)

1. Promote the development of renewable and low carbon sources of energy? 2. Be located within Flood Zone 2? If so, are there alternative sites in the area that can be allocated in preference to developing land in Flood Zone 2? (To be determined through the application of the Sequential Test) 3. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere?

Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above. Likely effects: minor adverse
Trowbridge	Overall effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above. Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above. Likely effects: moderate adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above. Likely effects: moderate adverse
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above. Likely effects: minor adverse
Overall score: -1.6 moderate adverse effects	

Conclusions/Recommendations: Moderate adverse effects likely overall for this emerging strategy. The areas considered most likely to experience significant adverse effects against this objective are Trowbridge, Warminster and Westbury.

Sustainability Appraisal Objective 6: Protect, maintain and enhance the historic environment

Decision-Aiding Questions (DAQ)

1. Conserve and enhance World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas and Historic Parks & Gardens, sites of archaeological interest, undesignated heritage assets and their settings? 2. Maintain and enhance the character and distinctiveness of settlements through high quality and appropriate design, taking into account the management objectives of Conservation Areas?

Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above.

	Likely effects: minor adverse
Trowbridge	Overall effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above.
	Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above.
	Likely effects: minor adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above.
	Likely effects: moderate adverse
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above.
	Likely effects: minor adverse
Overall score: -1.4 minor adverse effects	
Conclusions/Recommendations: Minor adverse effects likely overall for this emerging strategy. The areas considered most likely to experience significant adverse effects against this objective are Trowbridge and Westbury.	

Sustainability Appraisal Objective 7: Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place	
<u>Decision-Aiding Questions (DAQ)</u>	
1. Minimise impact on and where appropriate enhance nationally designated landscapes and their settings and locally valued landscapes? 2. Protect rights of way, public open space and common land?	
Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above.
	Likely effects: minor adverse
Trowbridge	Overall effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above.
	Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above.
	Likely effects: minor adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above.
	Likely effects: minor adverse
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above.
	Likely effects: minor adverse

Overall score: -1.2 minor adverse effects

Conclusions/Recommendations: Minor adverse effects likely overall for this emerging strategy. The area considered most likely to experience significant adverse effects against this objective is Trowbridge.

Sustainability Appraisal Objective 8: 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 (DAQ)

1. Provide an adequate supply of affordable housing? 2. Support the provision of a range of house types and sizes to meet the needs of all sectors of the community? 3. Deliver high quality residential development?

Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall adverse effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Benefits are therefore likely to be slightly greater than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above. Likely effects: minor adverse
Trowbridge	Overall beneficial effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Benefits are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above. Likely effects: moderate positive
Warminster	Overall beneficial effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Benefits are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above. Likely effects: minor positive
Westbury	Overall beneficial effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Benefits are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above. Likely effects: moderate positive
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above. Likely effects: neutral

Overall score: 0.8 minor positive effects

Conclusions/Recommendations: Minor benefits likely overall for this emerging strategy. The areas considered most likely to have significant benefits against this objective are Trowbridge and Westbury.

Sustainability Appraisal Objective 9: Reduce poverty and deprivation and promote more inclusive communities with better services and facilities.

Decision-Aiding Questions (DAQ)

1. Maximise opportunities within the most deprived areas? 2. Be accessible to educational, health, amenity greenspace, community and town centre facilities which are able to cope with the additional demand? 3. Promote/create public spaces and community facilities that might support public health, civic, cultural, recreational and community functions? 4. Reduce rural isolation, including access to affordable services for those without a car in rural areas?

Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall beneficial effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Benefits are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above. Likely effects: minor positive
Trowbridge	Overall beneficial effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Benefits are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above. Likely effects: moderate positive
Warminster	Overall beneficial effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Benefits are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above. Likely effects: minor positive
Westbury	Overall beneficial effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Benefits are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above. Likely effects: moderate positive
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above. Likely effects: minor positive
Overall score: 1.4 minor positive effects	
Conclusions/Recommendations: Minor benefits likely overall for this emerging strategy. The areas considered most likely to experience significant benefits against this objective are Trowbridge and Westbury.	

Sustainability Appraisal Objective 10: Reduce the need to travel and promote more sustainable transport choices	
<u>Decision-Aiding Questions (DAQ)</u>	
1. Promote mixed use developments, in accessible locations, that reduce the need to travel and reliance on the private car? 2. Provide suitable access and not significantly exacerbate issues of local transport capacity (unless there is evidence that such impacts can be mitigated)? 3. Make efficient use of existing transport infrastructure? 4. Provide the opportunity to create additional sustainable transport infrastructure including safe active travel?	
Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above. Likely effects: neutral
Trowbridge	Overall effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above. Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Adverse effects are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above. Likely effects: minor adverse

Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Adverse effects are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above. Likely effects: moderate adverse
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above. Likely effects: minor adverse
Overall score: -1.2 minor adverse effects	
Conclusions/Recommendations: Minor adverse effects likely overall for this emerging strategy. The areas considered most likely to experience significant adverse effects against this objective are Trowbridge and Westbury.	

Sustainability Appraisal Objective 11: Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth	
<u>Decision-Aiding Questions (DAQ)</u> 1. Support the vitality and viability of town centres (proximity to town centres, built up areas, station hub)? 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? 3. Contribute to the provision of infrastructure that will help to promote economic growth? 4. Promote a balance between residential and employment development to help reduce travel distances to work?	
Settlement/Area	Likely effects of Emerging Spatial Strategy 2016 – 2036 (Reg 18) per settlement/area
Bradford on Avon	Overall beneficial effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-C. However, this emerging strategy would deliver 50 dwellings more. Benefits are therefore likely to be slightly more significant than LHNA TR-C. Refer to the assessment findings for LHNA TR-C above. Likely effects: minor positive
Trowbridge	Overall beneficial effects considered likely to be similar to Standard Method Strategy TR-A. However, this emerging strategy would deliver 110 dwellings less. Benefits are therefore likely to be slightly less significant than Standard Method Strategy TR-A. Refer to the assessment findings for Standard Method Strategy TR-A above. Likely effects: moderate positive
Warminster	Overall beneficial effects considered likely to be similar to Local Housing Needs Assessment (LHNA) Strategy TR-B. However, this emerging strategy would deliver 100 dwellings more. Benefits are therefore likely to be slightly more significant than LHNA Strategy TR-B. Refer to the assessment findings for LHNA Strategy TR-B above. Likely effects: minor positive
Westbury	Overall beneficial effects considered likely to be similar to Standard Method Strategy TR-B. However, this emerging strategy would deliver 120 dwellings less. Benefits are therefore likely to be slightly less significant than Standard Method Strategy TR-B. Refer to the assessment findings for Standard Method Strategy TR-B above. Likely effects: moderate positive
Rest of HMA	Overall effects considered likely to be the same as Local Housing Needs Assessment (LHNA) Strategy TR-B. Refer to that assessment above. Likely effects: minor positive
Overall score: 1.4 minor positive effects	
Conclusions/Recommendations: Minor benefits likely overall for this emerging strategy. The areas considered most likely to experience significant benefits against this objective are Trowbridge and Westbury.	

SA Annex 1.4 - Trowbridge Housing Market Area (HMA) - Assessment of Revised Spatial Strategy 2020 – 2038 (Reg 19)

Settlement/area	Revised Spatial Strategy 2020 – 2038 (Reg 19)	
	Housing	Employment ¹ (ha)
Bradford on Avon	140	0
Trowbridge	4,420	0
Warminster	1,780	0
Westbury	1,400	0
Rest of HMA	910	0
TOTAL	8,650	0

Sustainability Appraisal Objective 1: Protect and enhance all biodiversity and geological features and avoid irreversible losses

Decision-Aiding Questions (DAQ)

1. Avoid potential negative impacts of development on designated wildlife sites, protected species and priority species and habitats (international, national, local) and enhance these where possible? 2. Ensure that all new developments protect Local Geological Sites (LGSs) from development? 3. Aid in the delivery of a network of multifunctional Green Infrastructure?

Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	The revised spatial strategy allocates less development to Bradford on Avon in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-C, allocating 135 more dwellings than the revised spatial strategy, is the nearest comparable assessment. Adverse effects are therefore likely to be slightly less significant. Likely effects: minor adverse
Trowbridge	The revised spatial strategy allocates less development to Trowbridge in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-B, allocating 500 more dwelling than the revised spatial strategy, is the nearest comparable assessment. Adverse effects are therefore likely to be slightly less significant. However, the level of growth remains reasonably high in a location of ecological sensitivity. Likely effects: moderate adverse
Warminster	The revised spatial strategy allocates a similar level of growth to Warminster as several of the other strategies, being most comparable to Alternative Development Strategy (Standard Method) TR-B, just 5 dwellings separating the two strategies. Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-B. Likely effects: moderate adverse
Westbury	Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-C given the housing allocation differs by just 5 dwellings. Refer to the assessment findings for Standard Method Strategy TR-C above. Likely effects: minor adverse
Rest of HMA	Overall effects are considered likely to be the same as the Emerging Spatial Strategy and Alternative Development Strategy (Local Housing Needs Assessment) TR-B, both these strategies allocating only 40 more dwellings to the Rest of HMA in comparison to revised spatial strategy. Likely effects: minor adverse

¹ Employment figures based on actual allocations in Local Plan

Overall score: -1.4 minor adverse effect

Conclusions/Recommendations:

Minor adverse effects are considered likely overall for this revised strategy. The settlements anticipated likely to experience significant adverse effects are Trowbridge and Warminster. In both instances this relates to ecological sensitivities present at the town and/or nearby designations vulnerable to higher levels of growth. This revised strategy is considered more sustainable than the Emerging Spatial Strategy against this objective, which had an overall score of -1.6.

Sustainability Appraisal Objective 2: Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings

Decision-Aiding Questions (DAQ)

1. Ensure efficient use of land? 2. Lead to the reuse of Previously Developed Land where possible/appropriate? 3. Encourage remediation of contaminated land? If so, would this lead to issues of viability and deliverability? 4. Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)? 5. Lead to the sterilisation of viable mineral resources? If so, is there potential to extract the mineral resource as part of the development?

Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	Overall effects considered likely to be less than all other strategies assessed so far with just 140 dwellings proposed at Bradford on Avon. Minor adverse effects likely overall. Likely effects: minor adverse
Trowbridge	This is the lowest level of growth considered of all strategies so far at Trowbridge. However, 4420 dwellings is still a significant amount of housing and is likely to result in significant loss of greenfield land. As a result, moderate adverse effects on this objective are considered likely. Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Standard Method Strategy TR-B. Moderate adverse effects are considered likely. Likely effects: moderate adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-C. Minor adverse effects are considered likely. Likely effects: minor adverse
Rest of HMA	Overall effects considered likely to be similar to the Emerging Spatial Strategy with the revised strategy proposing just 40 fewer homes. Minor adverse effects likely. Likely effects: minor adverse

Overall score: -1.4 minor adverse effect

Conclusions/Recommendations: Minor adverse effects likely overall for this revised strategy, whereas the emerging strategy was likely to have a moderate adverse effect. This is due to the revised strategy proposing 2350 fewer homes across the HMA. The areas considered most likely to experience significant adverse effects against this objective are Trowbridge and Warminster.

Sustainability Appraisal Objective 3: Use and manage water resources in a sustainable manner

Decision-Aiding Questions (DAQ)

1. Protect surface, ground and drinking water quality? 2. Direct development to sites where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?

Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	The revised spatial strategy allocates less development to Bradford on Avon in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-C, allocating 135 more dwellings than the revised spatial strategy, is the nearest comparable assessment. Adverse effects are therefore likely to be slightly less significant.

	Likely effects: Minor adverse
Trowbridge	The revised spatial strategy allocates less development to Trowbridge in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-B, allocating 500 more dwelling than the revised spatial strategy, is the nearest comparable assessment. Adverse effects are therefore likely to be slightly less significant but still moderate adverse.
	Likely effects: moderate adverse
Warminster	The revised spatial strategy allocates a similar level of growth to Warminster as several of the other strategies, being most comparable to Alternative Development Strategy (Standard Method) TR-B, just 5 dwellings separating the two strategies. Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-B.
	Likely effects: moderate adverse
Westbury	Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-C given the housing allocation differs by just 5 dwellings. Refer to the assessment findings for Standard Method Strategy TR-C above.
	Likely effects: minor adverse
Rest of HMA	Overall effects are considered likely to be the same as the Emerging Spatial Strategy and Alternative Development Strategy (Local Housing Needs Assessment) TR-B, both these strategies allocating only 40 more dwellings to the Rest of HMA in comparison to revised spatial strategy. This level of growth is considered likely to have minor adverse effects in the Rest of the HMA.
	Likely effects: minor adverse
Overall score: -1.4 minor adverse effect	
Conclusions/Recommendations:	
Minor adverse effects are considered likely overall for this revised strategy. The settlements anticipated likely to experience significant adverse effects are Trowbridge and Warminster. In both instances this relates to sensitivities present at the town and/area and potential risk to water resources makes these areas particularly vulnerable to higher levels of growth. This revised strategy is considered more sustainable than the Emerging Spatial Strategy against this objective, which had an overall score of -1.6 (moderate adverse effects).	

Sustainability Appraisal Objective 4: Improve air quality and minimise all sources of environmental pollution

Decision-Aiding Questions (DAQ)

1. Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration? 2. Minimise effects on and where possible improve air quality and locate sensitive development away from areas of poor air quality (such as AQMAs)? 3. Lie within a consultation risk zone for a major hazard site or hazardous installation?

Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	Overall effects considered likely to be less than all other strategies assessed so far with just 140 dwellings proposed at Bradford on Avon. All new development is likely to have some impacts on noise and light pollution. This figure is very low in proportionate and relative terms, therefore minor adverse effects likely overall.
	Likely effects: minor adverse
Trowbridge	This is the lowest level of growth considered of all strategies so far at Trowbridge. However, 4420 dwellings is still a significant amount of housing and is likely to result in significant loss of greenfield land. As a result, moderate adverse effects on this objective are considered likely.
	Likely effects: moderate adverse
Warminster	Overall effects considered likely to be very similar to Standard Method Strategy TR-B. Minor adverse effects are considered likely.
	Likely effects: minor adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-C. Likely effects are considered to be moderate adverse as there is currently an AQMA in place.
	Likely effects: moderate adverse

Rest of HMA	Overall effects considered likely to be similar to the Emerging Spatial Strategy with the strategy proposing just 40 fewer homes. The level of development proposed in the rest of the HMA is more likely to place development away from many of the county's existing AQMAs and therefore minor adverse effects are likely.
	Likely effects: minor adverse
Overall score: -1.4 minor adverse effect	
Conclusions/Recommendations:	
Minor adverse effects likely overall for this revised strategy. This is due to the revised strategy proposing 2350 fewer homes across the HMA. The areas considered most likely to experience significant adverse effects against this objective are Trowbridge and Westbury. This revised strategy is considered equally as sustainable as the Emerging Spatial Strategy against this objective, which also had an overall score of -1.4.	

Sustainability Appraisal Objective 5: Minimise impacts on climate change (mitigation) and reduce vulnerability to future climate change effects (adaptation)).	
<u>Decision-Aiding Questions (DAQ)</u>	
1. Promote the development of renewable and low carbon sources of energy? 2. Be located within Flood Zone 2? If so, are there alternative sites in the area that can be allocated in preference to developing land in Flood Zone 2? (To be determined through the application of the Sequential Test) 3. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere?	
Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	The revised spatial strategy allocates less development to Bradford on Avon in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-C, allocating 135 more dwellings than the revised spatial strategy, is the nearest comparable assessment. Adverse effects are therefore likely to be slightly less significant.
	Likely effects: minor adverse
Trowbridge	The revised spatial strategy allocates less development to Trowbridge in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-B, allocating 500 more dwelling than the revised spatial strategy, is the nearest comparable assessment. Adverse effects are therefore likely to be slightly less significant.
	Likely effects: minor adverse
Warminster	The revised spatial strategy allocates a similar level of growth to Warminster as several of the other strategies, being most comparable to Alternative Development Strategy (Standard Method) TR-B, just 5 dwellings separating the two strategies. Warminster is at moderate risk of river flooding and at high risk of surface water and groundwater flooding. Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-B, moderate adverse.
	Likely effects: moderate adverse
Westbury	Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-C given the housing allocation differs by just 5 dwellings. Refer to the assessment findings for Standard Method Strategy TR-C above.
	Likely effects: minor adverse
Rest of HMA	Overall effects are considered likely to be the same as the Emerging Spatial Strategy and Alternative Development Strategy (Local Housing Needs Assessment) TR-B, both these strategies allocating only 40 more dwellings to the Rest of HMA in comparison to revised spatial strategy. This level of growth is considered likely to have minor adverse effects in the Rest of the HMA.
	Likely effects: minor adverse
Overall score: -1.2 minor adverse effect	
Conclusions/Recommendations:	
Minor adverse effects are considered likely overall for this revised strategy. The settlement anticipated likely to experience significant adverse effects is Warminster due to river and surface water flood risk and cumulative impacts. This revised strategy is considered more sustainable than the Emerging Spatial Strategy against this objective, which had an overall score of -1.6 (moderate adverse effects).	

Sustainability Appraisal Objective 6: Protect, maintain and enhance the historic environment

Decision-Aiding Questions (DAQ)

1. Conserve or enhance World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas and Historic Parks & Gardens, sites of archaeological interest, undesignated heritage assets and their settings? 2. Maintain and enhance the character and distinctiveness of settlements through high quality and appropriate design, taking into account the management objectives of Conservation Areas?

Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	The revised spatial strategy proposes less development in Bradford on Avon in comparison to all other strategies assessed. The nearest comparable strategy is Alternative Development Strategy (Standard Method) TR-C which proposed 135 more dwellings than the revised spatial strategy. Refer to the assessment findings for Alternative Development Strategy (Standard Method) TR-C above. Although at 140 dwellings less development is being proposed in Bradford on Avon than that strategy the town is comparatively more constrained under this objective than other settlements in the HMA therefore likely effects are still considered likely to be minor adverse. Likely effects: Minor adverse
Trowbridge	At 4420 dwellings the revised spatial strategy proposes less development to Trowbridge in comparison to all other strategies assessed. The nearest comparable strategy is Alternative Development Strategy (Standard Method) TR-B which allocates 500 more dwellings than the revised spatial strategy. Refer to the assessment findings for Alternative Development Strategy (Standard Method) TR-C above. The likely effects are considered to be the same as for that strategy as minor adverse. Likely effects: Minor adverse
Warminster	The revised spatial strategy proposes less development to Warminster than the emerging spatial strategy. The nearest comparable strategy is Alternative Development Strategy (Standard Method) TR-B which proposed 5 less than the revised spatial strategy. Refer to the assessment findings for Alternative Development Strategy (Standard Method) TR-B above. The likely effects are therefore considered to be the same as for that strategy as minor adverse. Likely effects: Minor adverse
Westbury	The revised spatial strategy proposes less development to Westbury than the emerging spatial strategy. The nearest comparable strategy is Alternative Development Strategy (Standard Method) TR-C which proposed 5 less than the revised spatial strategy. Refer to the assessment findings for Alternative Development Strategy (Standard Method) TR-C above. The likely effects are therefore considered to be the same as for that strategy as minor adverse. Likely effects: Minor adverse
Rest of HMA	The revised spatial strategy proposes less development for the rest of the HMA than the emerging spatial strategy. The nearest comparable strategy is Alternative Development Strategy (Local Housing Needs Assessment) TR-B which proposed 40 more than the revised spatial strategy. Refer to the assessment findings for Alternative Development Strategy (Local Housing Needs Assessment) TR-B above. The likely effects are therefore considered to be the same as for that strategy as minor adverse. Likely effects: Minor adverse
Overall score: -1.0 minor adverse effect	

Conclusions/Recommendations:

Minor adverse effects are considered likely overall for this revised strategy for this objective. The strategy is considered to be more sustainable than the emerging spatial strategy which scored 1.4 with moderate adverse effects likely in Trowbridge and Westbury. Minor adverse effects are now likely in all settlements due to the reduction in the level of growth.

Sustainability Appraisal Objective 7: Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place

Decision-Aiding Questions (DAQ)

1. Minimise impact on and where appropriate enhance nationally designated landscapes and their settings and locally valued landscapes? 2. Protect rights of way, public open space and common land?

Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	The revised spatial strategy allocates less development to Bradford on Avon in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-C, allocating 135 more dwelling than the revised spatial strategy, is the nearest comparable assessment. Adverse effects are therefore likely to be slightly less significant. Likely effects: minor adverse
Trowbridge	The revised spatial strategy allocates less development to Trowbridge in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-B, allocating 500 more dwelling than the revised spatial strategy, is the nearest comparable assessment. Adverse effects are therefore likely to be slightly less significant. However, the level of growth remains reasonably high in a location where green belt, neighbouring settlements and ancient woodland may constrain development and heighten risks of significant effects. Likely effects: moderate adverse
Warminster	The revised spatial strategy allocates a similar level of growth to Warminster as several of the other strategies, being most comparable to Alternative Development Strategy (Standard Method) TR-B, just 5 dwellings separating the two strategies. Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-B. Likely effects: minor adverse
Westbury	Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-C given the housing allocation differs by just 5 dwellings. Refer to the assessment findings for Standard Method Strategy TR-C above. Likely effects: minor adverse
Rest of HMA	Overall effects are considered likely to be the same as the Emerging Spatial Strategy and Alternative Development Strategy (Local Housing Needs Assessment) TR-B, both these strategies allocating only 40 more dwellings to the Rest of HMA in comparison to revised spatial strategy. Likely effects: minor adverse
Overall score: -1.2 minor adverse effect	
Conclusions/Recommendations: Minor adverse effects are considered likely overall for this revised strategy. The only settlement anticipated likely to experience significant adverse effects is Trowbridge given the landscape sensitivities and designations present coupled with relatively high levels of growth. This revised strategy is considered as sustainable as the Emerging Spatial Strategy against this objective, given both the Emerging Spatial Strategy and this Revised Strategy both scored -1.2.	

Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Sustainability Appraisal Objective 8: Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures	
<u>Decision-Aiding Questions (DAQ)</u> 1. Provide an adequate supply of affordable housing? 2. Support the provision of a range of house types and sizes to meet the needs of all sectors of the community? 3. Deliver high quality residential development?	
Bradford on Avon	The revised spatial strategy proposes less development in Bradford on Avon in comparison to all other strategies assessed. The nearest comparable strategy is Alternative Development Strategy (Standard Method) TR-C which proposed 135 more dwellings than the revised spatial strategy. Refer to the assessment findings for Alternative Development Strategy (Standard Method) TR-C above. The lower growth figure will deliver less affordable housing and effects are likely to be minor adverse. Likely effects: minor adverse

Trowbridge	The revised spatial strategy proposes less development for Trowbridge in comparison to all other strategies assessed. The nearest comparable strategy is Alternative Development Strategy (Standard Method) TR-B. Refer to the assessment findings for Alternative Development Strategy (Standard Method) TR-B above. Although a lower growth figure it is still 4420 dwellings and will deliver affordable housing therefore likely effects are considered to be minor positive. Likely effects: moderate positive
Warminster	The revised spatial strategy proposes less development for Warminster than the emerging spatial strategy. The nearest comparable strategy is Alternative Development Strategy (Standard Method) TR-B. Refer to the assessment findings for Alternative Development Strategy (Standard Method) TR-B above. Taking into account existing commitments, this leaves no residual requirement to find. This means that, apart from existing commitments, no additional dwellings would be required in the latter part of the plan period to 2036, resulting in a hiatus of activity. Likely effects are considered to be moderate adverse. Likely effects: moderate adverse
Westbury	The revised spatial strategy proposes less development for Westbury than the emerging spatial strategy. The nearest comparable strategy is Alternative Development Strategy (Standard Method) TR-C. Refer to the assessment findings for Alternative Development Strategy (Standard Method) TR-C above. Likely effects are considered to be minor positive. Likely effects: minor positive
Rest of HMA	The revised spatial strategy proposes less development for the rest of the HMA than the emerging spatial strategy. The nearest comparable strategy is Alternative Development Strategy (Local Housing Needs Assessment) TR-B. Refer to the assessment findings for Alternative Development Strategy (Local Housing Needs Assessment) TR-B above. Likely effects are considered to be minor adverse. Likely effects: minor adverse
Overall score: -0.2 minor adverse effect	
Conclusions/Recommendations: Minor adverse effects are likely overall for this revised strategy. It is considered slightly less sustainable than the emerging spatial strategy. Scores have reduced in all settlements except Bradford on Avon. This is due to a reduction in the level of housing proposed as therefore less affordable housing will be delivered.	

Sustainability Appraisal Objective 9: Reduce poverty and deprivation and promote more inclusive communities with better services and facilities.

Decision-Aiding Questions (DAQ)

1. Maximise opportunities within the most deprived areas? 2. Be accessible to educational, health, amenity greenspace, community and town centre facilities which are able to cope with the additional demand? 3. Promote/create public spaces and community facilities that might support public health, civic, cultural, recreational and community functions? 4. Reduce rural isolation, including access to affordable services for those without a car in rural areas?

Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	The revised spatial strategy allocates less development to Bradford on Avon in comparison to all other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-C, allocating 135 more dwellings than the revised spatial strategy, is the nearest comparable assessment. The proposed 140 dwellings are considered likely to make very little difference overall for the town. Overall effects are considered likely to be neutral. Likely effects: neutral
Trowbridge	The revised spatial strategy allocates less development to Trowbridge in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-B, allocates 500 more dwellings than this revised spatial strategy, and is the nearest comparable assessment. The level of growth remains relatively high and thus is considered to be more positive than negative and so overall moderate positive effects are considered likely. Likely effects: moderate positive
Warminster	The revised spatial strategy allocates a similar level of growth to Warminster as several of the other strategies, being most comparable to Alternative Development Strategy (Standard Method) TR-B, with just 5 dwellings separating the two strategies. New development is considered likely to be more positive than negative in terms of reducing poverty and deprivation and promoting more inclusive communities. Overall, minor positive effects are considered likely.

	Likely effects: minor positive
Westbury	Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-C given the housing allocation differs by just 5 dwellings. Refer to the assessment findings for Standard Method Strategy TR-C above. Overall, minor positive effects are considered likely.
	Likely effects: minor positive
Rest of HMA	Overall effects are considered likely to be the same as the Emerging Spatial Strategy and Alternative Development Strategy (Local Housing Needs Assessment) TR-B, both these strategies allocating only 40 more dwellings to the Rest of HMA in comparison to revised spatial strategy. Overall, minor positive effects are considered likely.
	Likely effects: minor positive
Overall score: 1.0 Minor positive effect	
Conclusions/Recommendations:	
Overall, minor positive effects are considered likely for this objective of the Revised Spatial strategy. Minor positive effects are likely in all settlements due to the reduction in the level of growth, with moderate positive effects likely in Trowbridge. The strategy is considered to be less sustainable than the Emerging Spatial Strategy which scored 1.4, particularly as there is now no employment land proposed for the HMA.	

Sustainability Appraisal Objective 10: Reduce the need to travel and promote more sustainable transport choices	
<u>Decision-Aiding Questions (DAQ)</u>	
1. Promote mixed use developments, in accessible locations, that reduce the need to travel and reliance on the private car? 2. Provide suitable access and not significantly exacerbate issues of local transport capacity (unless there is evidence that such impacts can be mitigated)? 3. Make efficient use of existing transport infrastructure? 4. Provide the opportunity to create additional sustainable transport infrastructure including safe active travel?	
Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	Overall effects considered likely to be less than all other strategies assessed so far with just 140 dwellings proposed at Bradford on Avon. Overall effects considered likely to be neutral.
	Likely effects: neutral
Trowbridge	This is the lowest level of growth considered of all strategies so far at Trowbridge. However, 4420 dwellings is still a significant amount of housing and is likely to result in significant effects on the local highways system. As a result, moderate adverse effects on this objective are considered likely.
	Likely effects: moderate adverse
Warminster	Overall effects considered likely to be similar to Standard Method Strategy TR-B. Therefore, minor adverse effects are likely against this objective.
	Likely effects: minor adverse
Westbury	Overall effects considered likely to be similar to Standard Method Strategy TR-C. Refer to the assessment findings for Standard Method Strategy TR-C above. Minor adverse effects considered likely.
	Likely effects: minor adverse
Rest of HMA	Overall effects considered likely to be similar to the Emerging Spatial Strategy with the revised strategy proposing just 40 fewer homes. Minor adverse effects likely.
	Likely effects: minor adverse
Overall score: -1.0 minor adverse effect	
Conclusions/Recommendations: Minor adverse effects likely overall for this revised strategy. It is considered slightly more sustainable than the emerging spatial strategy. This is due to the revised strategy proposing 2350 fewer homes across the HMA. The only area considered likely to experience significant adverse effects against this objective is Trowbridge.	

Sustainability Appraisal Objective 11: Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth

Decision-Aiding Questions (DAQ)

1. Support the vitality and viability of town centres (proximity to town centres, built up areas, station hub)? 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? 3. Contribute to the provision of infrastructure that will help to promote economic growth? 4. Promote a balance between residential and employment development to help reduce travel distances to work?

Settlement/Area	Likely effects of Revised Spatial Strategy 2020 – 2038 (Reg 19) per settlement/area
Bradford on Avon	<p>The Revised Spatial Strategy allocates less development to Bradford on Avon in comparison to all other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-C, allocating 135 more dwellings than the Revised Spatial Strategy, is the nearest comparable assessment. Although only a small amount of new housing proposed, it will help support local businesses, the town centre and provide an increased supply of local labour. Minor Positive effects are therefore considered likely.</p> <p>Likely effects: minor positive</p>
Trowbridge	<p>The Revised Spatial Strategy allocates less development to Trowbridge in comparison to other strategies assessed so far. Alternative Development Strategy (Standard Method) TR-B, allocates 500 more dwellings than the Revised Spatial Strategy, and is the nearest comparable assessment. The significant amount of housing proposed will help support local businesses, the town centre, retail and employment parks around the town and provide an increased supply of local labour. Overall moderate positive effects are considered likely.</p> <p>Likely effects: moderate positive</p>
Warminster	<p>The Revised Spatial Strategy allocates a similar level of growth to Warminster as several of the other strategies, being most comparable to Alternative Development Strategy (Standard Method) TR-B, with just 5 dwellings separating the two strategies. The relatively large amount of housing under this strategy will help to support local businesses, the town centre and provide an increased supply of local labour. Overall minor positive effects are considered likely.</p> <p>Likely effects: minor positive</p>
Westbury	<p>Overall effects are considered likely to be similar to Alternative Development Strategy (Standard Method) TR-C given the housing allocation differs by just 5 dwellings. Refer to the assessment findings for Standard Method Strategy TR-C above. Overall minor positive effects are considered likely.</p> <p>Likely effects: minor positive</p>
Rest of HMA	<p>Overall effects are considered likely to be the same as the Emerging Spatial Strategy and Alternative Development Strategy (Local Housing Needs Assessment) TR-B, both these strategies allocating only 40 more dwellings to the Rest of HMA in comparison to revised spatial strategy. Overall minor positive effects are considered likely.</p> <p>Likely effects: minor positive</p>
Overall score: 1.2 Minor positive effect	
<p>Conclusions/Recommendations: Overall, minor positive effects are considered likely for this objective of the Revised Spatial Strategy. Minor positive effects are likely in all settlements due to the reduction in the level of growth, with moderate positive effects likely in Trowbridge. The strategy is considered to be less sustainable than the Emerging Spatial Strategy which scored 1.4, particularly as there is now no employment land proposed for the HMA.</p>	