



Wiltshire Council **LOCAL PLAN** Looking to the future

Formulating Alternative Development Strategies (ADSs) Wiltshire Council
Trowbridge Housing Market Area



Wiltshire Local Plan Review

Formulating Alternative Development Strategies – Trowbridge Housing Market Area

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Purpose

The purpose of this paper is to formulate alternative development strategies that will then each be tested to develop a preferred spatial strategy.

Introduction

1. The Local Plan Review is re-assessing the current spatial strategy for Wiltshire. A spatial strategy distributes the scale of growth for each part of the County. It is expressed in numbers of additional homes and land for employment development over the plan period 2016-2036. The public will be consulted on an emerging strategy that will result from an assessment of different alternatives. This paper formulates these alternatives.
2. A Local Housing Need Assessment has identified four housing market areas (HMAs) in Wiltshire and forecast a scale of need for each. Meeting the forecasts need of each HMA helps to ensure needs are met where they arise. The subject of this paper is how scales of growth are distributed within each¹.
3. This paper sets out the conclusions of various assessments to identify reasonable alternative development strategies in the Trowbridge Housing Market Area. They can then be tested through Sustainability Appraisal from which a preferred development strategy can emerge.
4. The aim is not to identify all conceivable alternative development strategies. This would be impractical. The aim instead is to have a set that contains sufficiently different alternatives that represent sensible choices, capable of being tested.

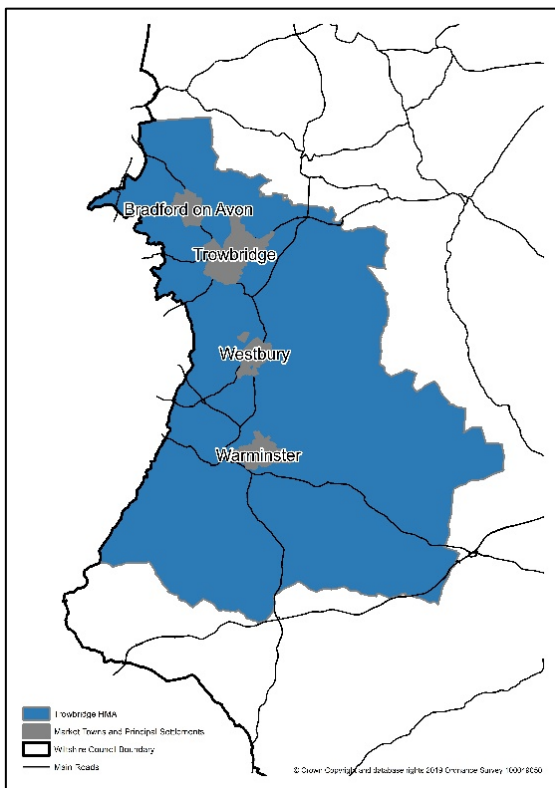


Figure 1 Trowbridge Housing Market Area

¹¹ Swindon and Wiltshire Local Housing Needs Assessments 2018-19, ORS, (April 2019)

5. The process is carried out through comparison with rolling forward the current spatial strategy (as set out in the Wiltshire Core Strategy). Rolling forward the current strategy uses the forecast scales of need and applies it to a distribution that has already been found sound.
6. Assessments examine where there may need to be changes by a set of comparisons. They examine:
 - The risks of unacceptable environmental impacts;
 - Comparisons with social and economic factors (such as employment projections); and
 - Deliverability
7. The results of public consultation also help to highlight where alternatives may need to be considered, in terms of new issues and opportunities. Possible alternatives are also influenced by the capacity of the infrastructure necessary to support new development.
8. Assessment is divided into two parts:
 - By place; and
 - By potential scales of growth.

Rolling Forward the Current Strategy

What scales of growth would there be continuing the current strategy?

9. Each part of the Housing Market Area (HMA) accommodates the equivalent share of housing and employment needs as the current Wiltshire Core Strategy.
10. A local housing need assessment for Wiltshire is based upon a standard national method². The standard method identifies a minimum number of homes that addresses projected household growth. Local housing need assessment suggests a higher figure than the minimum taking account of long-term migration trends, the balance of workers to jobs, amongst other aspects³. The higher figure (45,630 homes) is used to develop alternatives. It recognises this additional assessment and the benefit of having some contingency as a part of housing delivery.
11. Overall, the evidence suggests a need to plan for a modest 4% reduction in the number of homes needed over the plan period compared to 2006-2026, as shown in Table 1 below, Rolling forward this change in the same distribution as the current strategy suggests the following housing requirements to meet the needs of the HMA.

Principal Settlement/Market Town	Wiltshire Core Strategy 2006-2026	Rolling forward for 2016-36
Bradford on Avon	595	570
Trowbridge	6810	6520

² The Government has consulted on wider reforms to the planning system, including the standard method for assessing housing numbers in strategic plans in 'Changes to the current planning system - Consultation on changes to planning policy and regulations', MHCLG, (Aug 2020). See also 'Swindon and Wiltshire Strategic Housing Market Assessment', ORS, (Nov 2017) and 'Swindon and Wiltshire Local Housing Needs Assessments 2018-19', ORS, (April 2019).

³ Swindon and Wiltshire Local Housing Needs Assessments 2018-19, ORS, (April 2019), figure 15

Warminster	1920	1840
Westbury	1500	1435
Rest of HMA	665	635
Total	11490	11000

Table 1 Housing requirements - Rolling forward the current strategy for 2016 -2036

12. The basis for the total amount of employment land needed over the period 2016-2036 has been established in the Swindon and Wiltshire Functional Economic Area Assessment (FEMA) 2016⁴ (supplemented by the 2018 Wiltshire Employment Land Review (ELR)⁵. The employment land requirement total has been distributed according to the equivalent share of employment under the current strategy for the period 2016-36.
13. There would be an 8% reduction in employment land planned for in the next 20 years in this HMA compared to 2011-2026. The distribution to settlements and the rural area would be as follows:

	WCS requirement 2011-26 (ha)	Rolling forward for 2016-36 (ha)
Trowbridge	25	23.0
Bradford on Avon	3	2.8
Westbury	18.5	17.0
Warminster	6	5.5
Rest of the HMA	3	1.3
Total	55.5	49.6

Table 2 Employment Requirements - Rolling forward the current strategy for 2016 - 2036

⁴ Swindon and Wiltshire Functional Economic Market Area Assessment Associates (2016)

⁵ Wiltshire Employment Land Review, Final Report, Hardisty Jones Associates (April 2018)

Context

14. Choices over what alternatives may be suitable cannot be made without considering the context in which they are being formulated. It is important to take account of the current circumstance, especially where it has changed significantly since the current strategy was adopted. There may be shifts in the local economy to which a planning framework will need to adjust, for example where there are growth or regeneration strategies in place⁶.
15. At a more practical level, the scope for alternatives must take account of commitments to development that are already in place and which would not be realistic or sensible to reverse. A proportion of the land that would be required for development has already been completed or committed (e.g. granted planning consent or has been allocated). These commitments help to define the scope for alternatives. The scale of commitments in each part of the HMA is as follows⁷:

Principal Settlement/Market Town	Dwellings built, with planning permission or allocated. April 2018
Bradford on Avon	228
Rest of HMA	1031
Trowbridge	3516
Warminster	2035
Westbury	1068
Total	7878

Table 3 Current housing commitments

The Wiltshire Housing Site Allocations Plans

16. A Housing Site Allocations Plan was adopted in February 2020 that includes a number of sites for housing development at other towns and villages in the HMA. The Plan's contribution to housing supply is estimated in the commitments above⁸ from a draft stage of preparation.

Wiltshire Employment Land Review

17. An Employment Land Review (ELR) for Wiltshire, dated April 2018, sets out an assessment of the future demand for Business Use Class employment land in Wiltshire, a review of the supply of sites, and assesses the fit between the two. The ELR builds on the Functional Economic Market Area Assessment 2017. It also provides an indicative distribution of growth within each FEMA based on alternative scenarios. The ELR then makes recommendations on practical and policy interventions needed to ensure that there is a enough supply of sites in Wiltshire over the period to 2036.
18. The ELR data informed the baseline analysis and strategy development in this document and the FEMA data therein has been used to derive HMA based employment data.

⁶ Paragraph: 010 Reference ID: 2a-010-20180913, Planning Practice Guidance, MHCLG (Sept 2018)

⁷ The baseline for data in this paper is 2018. Further work will be based on following years, but differences will not affect the high level consideration and conclusions of this paper.

⁸ The submitted draft Wiltshire Housing Site Allocations Plan included housing sites in the HMA; estimates of site capacities may have changed in later stages of plan preparation.

19. Forecast employment needs show a reduction in the future. The WCS strategy also deliberately allocated a large amount of land for employment land in excess of assessed need. It allowed business greater choice and flexibility and provides much greater encouragement to local economic growth. Whether to continue this approach is one of the questions for the review.

Green belt

20. Green belt covers a western eastern section of the HMA (see Figure 2). Great importance attaches to green belt with the aim of preventing urban sprawl by keeping land permanently open. The outer boundary affects the future growth of some settlements in the HMA.
21. Green belt designation severely constrains scope for outward expansion at Bradford on Avon. It also extends to the western edge of Trowbridge. Other designated Large Villages are also completely within its area.
22. The National Planning Policy Framework states that:
“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”⁹
23. There is a modest reduction in forecast housing need over the plan period. It is not considered that pressures at settlements justify an exceptional circumstance that green belt boundaries should be altered. This might, however, suggest a result, if not accommodated, of pressures to release land that would be greater at other settlements.

Assumptions

24. The Wiltshire Housing Site Allocations Plan is being prepared. It proposes to allocate several sites at Trowbridge and at Warminster, as well as at the villages within the HMA. Although yet to be finalised, the scale of housing delivered that this plan will help deliver¹⁰ is included in the commitments above.
25. At face value, continuing the current strategy would result in planning for more homes at similar rates as the current strategy but less land for employment.
26. There are two assumptions at this stage.

Assumptions

It is not proposed to review current plan allocations. In general, these are necessary to support a deliverable supply of land for housing development.

It is assumed there that there is no strategic need for a review of green belt designation boundaries.

Table 4 Assumptions

⁹ Paragraph 136, NPPF, MHCLG (Feb 2019)

¹⁰ The estimate includes this total number of dwellings estimated in the version of the plan submitted to the Secretary of State for examining, July 2018

Place based assessment

Environmental Impacts

27. This element of assessment asks the question: would the continuation of the existing strategy result in unacceptable environmental impacts? It considers environmental aspects to sustainable development. The assessment considers the residual growth that would be necessary to meet the current strategy after current completions and commitments that are shown in table three. This gives a better indication of the impact of likely revised requirements on the environment in and around a settlement.
28. A high level environmental assessment is made in four topic areas:
- Biodiversity
 - Flood risk
 - Heritage
 - Landscape
29. Each assessment highlights both threats and opportunities that might be delivered by rolling forward the current strategy at each settlement. An overall judgement reflects the risk of unacceptable harm resulting from the additional amount of development each settlement would need to accommodate. Levels of risks are graded from low to high. (green is low; amber is moderate, red is high).
30. At this stage of plan making, without identifying specific directions for growth or sites for development, an assessment is necessarily a broad judgement. A high level of risk would suggest lower rates of growth than those suggested. A lower level of risk might suggest it could be acceptable or possibly higher. The assessment method is summarised in annex one. All judgements would be subject to further testing.
31. The rest of the HMA, outside Market Towns and Principal Settlements, encompasses the rural area of the HMA. It is not possible to make a judgement about this area because it is so extensive and diverse. The need to protect countryside and manage development to meet local needs will continue. Individually, settlements within the rest of the HMA will be expected to accommodate a small proportion of overall housing needs. Past planned and actual rates of housing and employment growth are a proxy guide to environmental risks at this stage of plan preparation and to what constitutes reasonable alternative levels. More detailed assessment will take place in later stages of plan preparation.
32. The conclusions in summary are shown in the table below:

	Biodiversity	Landscape	Heritage	Flood Risk
Trowbridge	Red	Red	Red	Yellow
Bradford on Avon	Red	Red	Red	Yellow
Westbury	Yellow	Yellow	Yellow	Yellow
Warminster	Red	Red	Red	Yellow

Table 5 Environmental aspects of rolling forward the current strategy for 2016 - 2036

Conclusion

33. Rolling forward the current strategy was seen as involving some high risks of unacceptable harm to all the main settlements within the HMA except **Westbury**. Even so, at Westbury the character and setting to outlying settlements needs to be preserved and there are individual designated assets requiring protection including farmsteads, Heyward House, Westbury White Horse and Bratton Camp.
34. The potential for effects on the Bath and Bradford on Avon Bats Special Area for Conservation is a main constraint affecting Trowbridge and Bradford on Avon and potentially the northern fringes of Westbury. Fluvial flood risks are a prominent concern in all settlements.
35. **Bradford on Avon** is surrounded by green belt and close by several parklands and former manors which provide setting and historic context.
36. **Trowbridge** is also constrained by green belt. An additional factor is the need to preserve the setting to several outlying settlements, each with character and historic assets to conserve.
37. Expansion at **Warminster** has little direction for growth without direct or indirect effects on designated landscapes. Protection to the setting of prominent Scheduled hillforts at Cley Hill, Battlesbury and Scratchbury is also a consideration. Levels of phosphate in the River Wyke have been marked and further development might need to be constrained in order to avoid effects on the River Avon Special Area for Conservation.
38. The extent and nature of risks also suggests that a review of the green belt boundaries would not necessarily increase scope for peripheral expansion at **Bradford on Avon** or **Trowbridge**

Infrastructure constraints and opportunities

39. The provision of infrastructure necessary to support growth is a common issue to all the plan area. At this point, the capacity for the transport network and secondary education at each settlement are central infrastructure concerns. If there is a likelihood of significant infrastructure inadequacies or a need for substantial additional investment in these areas, then these factors may also require the formulation of alternative development strategies.
40. It will be more difficult to roll forward the current strategy if a new secondary school will be needed. The assessment estimates how many years before a new school will be necessary using implied rates of housing development arising from rolling forward the current strategy. Committed development and planned school investment have already been taken into account in this assessment.
41. Rolling forward the current strategy will be better supported by locating future development where it has the best access to a range of transport modes. The best performing settlement's will be defined by the following factors:
 - Have a Rail station
 - Have direct access to the Key Bus Route Network
 - Have direct access to Wiltshire's Road Freight Network / Primary Route Network
 - Have a town Cycle Network
42. Main settlements have therefore been classified per their access to a range of transport modes (a rail station, bus services etc). Settlements with access to all are graded five.

Settlements that have 3 of any combination of the above are graded four and so on. Definitions of each are set out in annex 2.

Principal Settlement/Market Town	Education (years before a new secondary school)	Transport (settlement accessibility level)
Trowbridge	9.5	5
Bradford on Avon	6.9	3
Westbury	22.3	5
Warminster	16.3	5
Rest of HMA	n/a	1-2

Table 6 Education and Transport constraints of rolling forward the current strategy for 2016 - 2036

43. An impact of rolling forward the current strategy will be an increase in traffic generation. Trowbridge, Warminster and Westbury are all assessed to be in the highest rank in terms of on access to a range of transport modes.

Conclusion

44. The lack of secondary capacity at **Bradford on Avon** is a possible constraint to future growth. **Trowbridge** might also require further capacity to support growth in the second half of the plan period. The estimates for Trowbridge factor in the secondary provision proposed as part of the Ashton Park urban extension. The town's growth could be constrained by the need for a further increase in capacity. There is less constraint elsewhere where, for example, at Warminster a large amount of demand arises from the West Extension and arrangements have already been considered.
45. As elsewhere in Wiltshire, further growth is likely to create widespread community concern about its impact on local transport networks and the environmental consequences. However, in terms of transport infrastructure, the HMA's main settlements have broadly good accessibility compared to elsewhere. Only **Bradford on Avon** does not have the highest accessibility ranking.

Public consultation

Issues Consultation 2017

46. The Council consulted the public in November 2017 on a number of strategic issues the plan might need to address. Issues were articulated for each HMA and there were ones specific to a settlement. It was also an opportunity to raise new issues. A full summary of the results of the consultation is contained in a set of separate reports. The following table sets out some of the key findings.
47. The current strategy can be compared to these issues and assessed to see whether alternatives need to be considered. The level of support for growth from business, developers and landowners is a factor. For example, the scale of land being offered for development at a particular place can play a large part in determining how much growth is realistic. It is also important not to rule out reasonable opportunities suggested as a result of public consultation.

Town	Issue	Consultation response
Trowbridge	Is the town sufficiently attractive to inward investment to support its current role as a focus for growth in Wiltshire? What could be done to improve its attractiveness?	<p>Numerous representations called for a halt to further housing allocations due to the surplus of workers and high deprivation levels. Instead, it was suggested that the regeneration of the Town Centre should be prioritised and a need for retirement homes and care homes was highlighted.</p> <p>There were concerns that house building during 2006-2016 was deflected from Chippenham to market towns in north and west Wiltshire.</p> <p>There were comments on delays to the Ashton Park development. It was suggested that the strategy should look toward development of a mix of size, types and locations at the edges of Large Villages, instead of urban extensions.</p> <p>Improving transport infrastructure, including increasing the rail service and improving highways, was supported as a way to facilitate access to employment, attract inward investment and improve air quality. Improvements to bus services and bus passenger facilities were suggested as a priority in the plan</p>
Trowbridge	Environmental constraints may limit potential for additional land for employment and housing, should the extent of the Green Belt be reviewed?	<p>The minority of representations regarding the Green Belt objected to a review due to the Green Belt helping to make the town more attractive, and arguing that brownfield sites should be prioritised.</p> <p>There was generally support for a Green Belt review, particularly if it released additional employment land. It was also supported in order to open up sites which are served by existing transport infrastructure, to achieve a better distribution of housing and to prevent housing being deflected onto Large Villages such as Southwick and North Bradley.</p> <p>It was stated that the constraints map did not reflect constraints associated with bats and there were suggestions for a further layer to be added to show why sites have been environmentally discounted.</p>

Town	Issue	Consultation response
Trowbridge	Are there further brownfield opportunities for redevelopment that can make significant improvement to the town and the vitality and viability of the town centre in particular?	Brownfield opportunities with close proximity to employment, including the Bowyer site, County Hall East and the ex-hospital site, should be prioritised to help make the town more attractive and prevent development on greenfield land.
Bradford on Avon	A restricted scope for development particularly limits potential for new employment and local affordable homes, should the extent of the Green Belt be reviewed?	<p>There was support for a Green Belt review as it currently constrains employment and housing opportunities due to the limited ability to expand, preventing the town from meeting future development requirements. The Town Council supported the increased protection of the Green Belt to maintain community identity and provide green space.</p> <p>Further development in Bradford on Avon was argued against due to the potential strain on infrastructure, and peripheral expansion was recommended to move traffic demands away from the Town Centre</p> <p>Due to constraints in the east and west of Bradford on Avon, it was suggested that the most appropriate area for development would be to the north of the town, extending the existing settlement boundary towards the B3105. However, the Town Council strongly objected to any expansion of the settlement boundary</p>
Bradford on Avon	Commercial floorspace is vulnerable to being lost to other uses, increased commuting worsens local air quality, how can the viability and vitality of the town centre be enhanced?	<p>It was noted that there is a need for both employment and housing land allocations.</p> <p>It was emphasised that new development needs to be community led, and mixed use allocations were suggested to complement existing communities and ensure that growth can be delivered without detriment to economic growth.</p> <p>Improvements to public transport were highlighted as a potential addition to the vision for Bradford on Avon.</p>
Warminster	Where should the focus for growth be at Warminster	Disagree that there are significant environmental constraints when compared to Trowbridge

Town	Issue	Consultation response
	alongside the West Urban Extension?	<p>Chitterne Parish Council was concerned about the effects of more housing on infrastructure, particularly the B390, and would like to see an upgrade of the A303</p> <p>Warminster Town Council suggested a bypass for Westbury and A303 upgrade to benefit visitors to the Longleat Hotel when built</p> <p>Expansion of Warminster was supported due to good road and rail links and a range of facilities which higher levels of growth would improve</p> <p>West Urban Extension should not be considered the sole focus of growth given the delays to the application to date</p> <p>Housing allocations to the southern end of the A350 corridor beyond Westbury were argued against due to longer distance commuting than locations closer to where the main economic potential is located.</p>
Westbury	Should Westbury become a greater focus for growth or maintain a strategy of consolidation?	<p>There was support for more growth at Westbury due to a lack of environmental constraints, having a major train station, being positioned on the A350 corridor and having a considerable market capacity. It was also hoped that more development could support the delivery of improvements to the A350</p>
Westbury	How can improvements to the town centre and around the railway station be brought forward? What other measures could enhance the vitality and viability of the town centre and improve local infrastructure?	<p>The majority of representations regarding Westbury were related to transport infrastructure. Opportunities which were mentioned included upgrading Dilton Marsh train station, providing a bypass for Westbury and upgrading the A350.</p> <p>It was suggested that congestion in and around Hawkeridge and West Wiltshire Trading Estate needs to be given a higher priority as a major constraint on growth.</p>

Town	Issue	Consultation response
HMA	The SHMA suggest a modest increase in housing needs, but a surplus workers compared to jobs within the area, should housing needs be met in the HMA? And if not where else?	<p>Representations made by developers noted that the housing need should be met as far as possible within the HMA and that the surplus of workers should not prevent further development, but simply encourage further employment related development.</p> <p>However, representations made by the general public expressed concern that Trowbridge was bearing a large proportion of the proposed increase in housing.</p>
HMA	Should the extent of the green belt be reviewed to enable development needs to be met?	There was a general consensus that a Green Belt review should not be undertaken, especially if smaller settlement expansion was favoured over larger, urban expansion
HMA	What are relationships (1) between settlements within the HMA and (2) with settlements outside; and how might transport infrastructure attract inward investment or influence commuting patterns?	<p>It was agreed that relationships between the settlements within the HMA are strong, although it was suggested that further assessment into this was necessary.</p> <p>However, it was also acknowledged that the settlements within the HMA have strong relationships other settlements up the A350 to Chippenham and the M4 and beyond to Bath and the West of England. Consequently, it was highlighted that infrastructure development will be an important issue in these areas</p>
HMA		<p>There was some confusion over how the strategic issues emerged from the settlement assessment as set out in Step 3 of the methodology.</p> <p>It was argued that the function and capacity of the HMA could not be deduced by only looking at the larger settlements, so it was suggested that an assessment that takes account of smaller settlements should be undertaken.</p>

Town	Issue	Consultation response
		It was noted that the older population as identified in Bradford on Avon was not specified as a constraint within other Wiltshire settlements.
HMA		<p>Transport infrastructure was identified as a development constraint and suggestions for improvements included:</p> <ul style="list-style-type: none"> upgrading the A350 to a trunk road providing of a bypass around Westbury increasing the frequency of the rail service including extending the evening service providing a halt at White Horse Business Park

Table 7 Summary of consultation responses 2017

48. In 2017 the Council also consulted on the evidence base underpinning the Swindon and Wiltshire Joint Spatial Framework. The Functional Economic Market Area Assessment (FEMAA) informs the evidence on economic growth in each of the FEMAs which in turn can be aligned with the Housing Market Areas.
49. The responses relevant to the Trowbridge HMA highlight the need for growth at market towns and in rural parishes. It was also queried what the Council's intervention strategy is to deliver employment. Responses emphasise the need to consult the business community and specialists on what land is required where to attract key sectors to the Wiltshire/Swindon area.

Town and Parish Workshops on Distribution of Growth

50. Informal consultation took place between October and November 2018 with local members, town and parish councils and representatives of neighbourhood plan groups at which preliminary findings were presented as a basis for discussion. Discussions are summarised below alongside how they influenced the development of alternative development strategies.

Settlement	Summary
Bradford on Avon	The main concerns that were raised regarding housing growth in Bradford on Avon related to transport issues and subsequent air quality issues. However, it was also noted that housing growth could bring employment, retail and regeneration opportunities.
Trowbridge	A consistent point of discussion regarding Trowbridge was the need for a review of the Green Belt to enable the most suitable sites for housing growth to be released. Furthermore, it was considered important that future housing development is directed at locations that minimises the impact on road infrastructure, or otherwise, housing should have road infrastructure developed alongside it.
Warminster	The outcome of the discussions regarding Warminster suggested that representatives were prepared to take the proposed level of housing growth, but that a higher level of growth would not be suitable due to accommodating high levels of growth in the past.
Westbury	In Westbury, the discussions were focussed predominantly on infrastructure provision. There was a strong desire from representatives for sustainable transport links associated with new development, and better cycle and walking connections.

Table 8 Summary of consultation responses 2018

Conclusion

51. In terms of future growth prospects, there was a range of different outlooks for each settlement.
52. Higher growth advocated at **Bradford on Avon** was linked to a review of green belt boundaries, concerns over transport and air quality alongside the need to support the local economy.

Strategies for higher rates of growth at **Westbury** were linked to investment in transport that addresses current problems and that could help to attract employment development. There was support for more growth in both homes and jobs at smaller rural settlements in the **rest of the HMA**; to maintain their resilience but also is this might help the loss of green belt.

53. No substantially different alternatives were suggested for **Warminster**. At **Trowbridge** there was support for lower rates of growth, improving the mix of sites and giving greater priority to brownfield sites.

Assessment of potential scales of growth

54. The comparisons look at social and economic aspects of sustainable development, how much forecast economic growth and how the distribution of housing needs matches the pattern of development rolling forward the current strategy.
55. A first comparison, however, looks at how achievable and realistic it is to roll forward the current strategy – is it deliverable? This can provide insight into the range and scope of alternatives that should be tested.
56. There are therefore three sets of comparisons:
 - **Deliverability** - Would the current strategy be capable of being delivered in terms of housing and employment?
 - **Economic aspects** - Would the current strategy match jobs and prospects for economic growth?
 - **Social aspects** - How well would the distribution of housing match where people live? Is it capable of meeting different needs for homes – in particular affordable homes

Deliverability

Do recent trends, current commitments and available land indicate that the current strategy can be delivered?

57. Whether a future strategy is realistic and achievable depends upon several factors. This section looks at three:

Trends - Past development trends – if past rates of development at a settlement have been much lower than expected then this may indicate there would be issues to resolve. The higher the increase in rates necessary to roll forward the current strategy the less realistic this strategy may be. Conversely, the less an increase the more realistic it may be.

Land availability - Land committed – a proportion of the growth envisaged is already in the pipeline. This would show whether continuing the current strategy was more achievable at some places and less at others. The less land still needing to be identified the greater the prospects are that the current strategy can be delivered.

Land availability - Land promoted for development – a large or small amount of land may be being promoted for development but not allocated or have consent. This may limit or widen options for growth and the amount can show whether the current strategy was reasonable. Levels also provides a market signal of commercial interest. The more land promoted the greater the scope and therefore prospects of delivering the current strategy.

58. Land promoted for development is recorded in the Strategic Housing and Employment Land Availability Assessment and this can be used to provide a broad estimate of the scale of development that can be considered at each settlement and how soon it could be made available. Some areas have been considered in previous plans. Others have been promoted more recently; for instance, as a response to a call for sites and consultation as a part of plan preparation.

Housing

59. Meeting forecast housing needs in the HMA suggests a decrease in rates of house building. If requirements continued what has been achieved by past rates, there would be more homes proposed in some areas and less in others.
60. **Trends – past development trends.** If housing was allocated according to rates of development over the period 2006 to 2016 there would be substantial differences from rolling forward the current strategy.

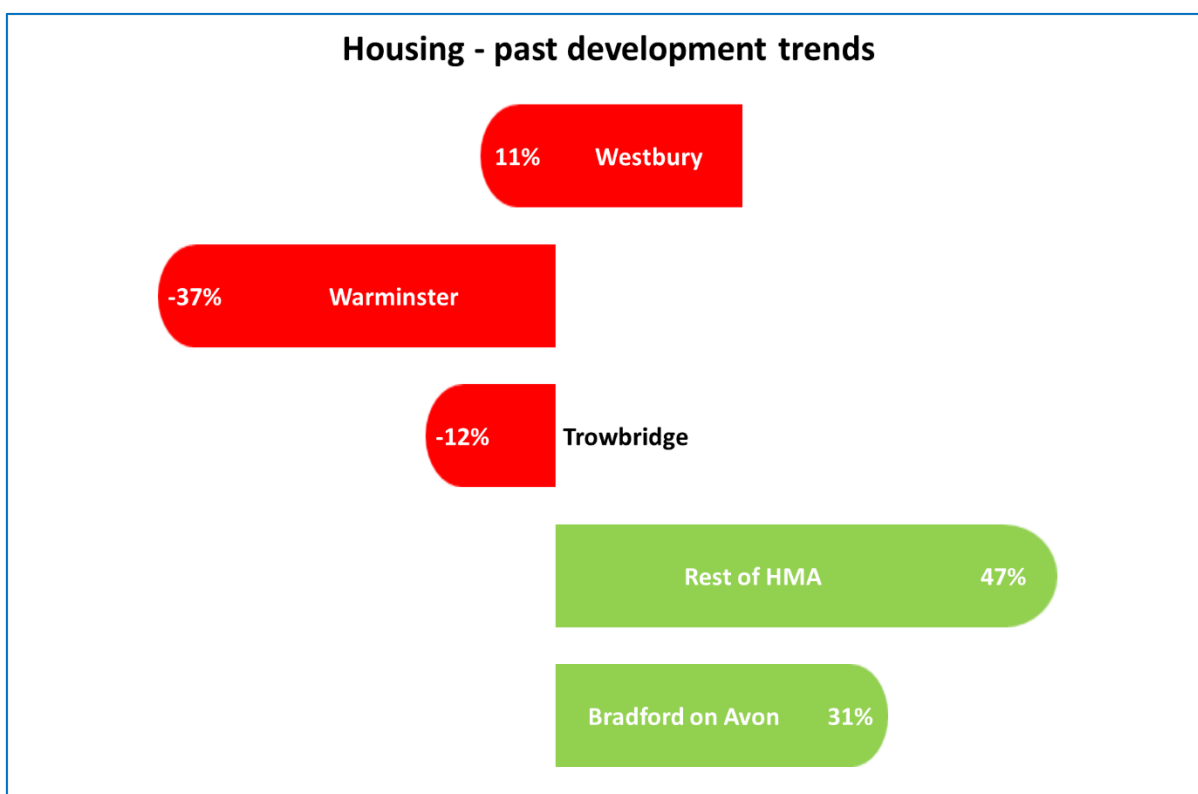


Figure 2 Housing - past development trends (2006-2018)

61. Much less housing would be built in **Warminster** and **Trowbridge** than would be expected if the current strategy was rolled forward. Rates of development at **Bradford on Avon** and the **rest of the HMA** have however exceeded implied rates.
62. In terms of deliverability, however, **Warminster** has a substantial proportion of requirements already in the pipeline; largely due to an urban extension (see below). The complexity and the time taken to deliver this site has been a large factor in the under delivery of housing over the WCS plan period since it is such a dominant proportion of the local land supply.
63. Again, the complexity of delivering a large urban extension at **Trowbridge** has also had a substantial impact upon delivery.
64. On this evidence alone, it is not possible to conclude that market trends indicate less growth at either Trowbridge or Warminster. There are however pressures for higher growth at **Bradford on Avon** and in **the rest of the HMA**.
65. **Land availability - Land allocated or with consent.** A high proportion of land needed to accommodate levels of development to roll forward the current strategy has consent or has already been allocated at **Warminster** and the **rest of the HMA**. It is likely that there would

be no need to allocate significant additional housing sites on the basis of meeting the scale of housing needs at April 2018.

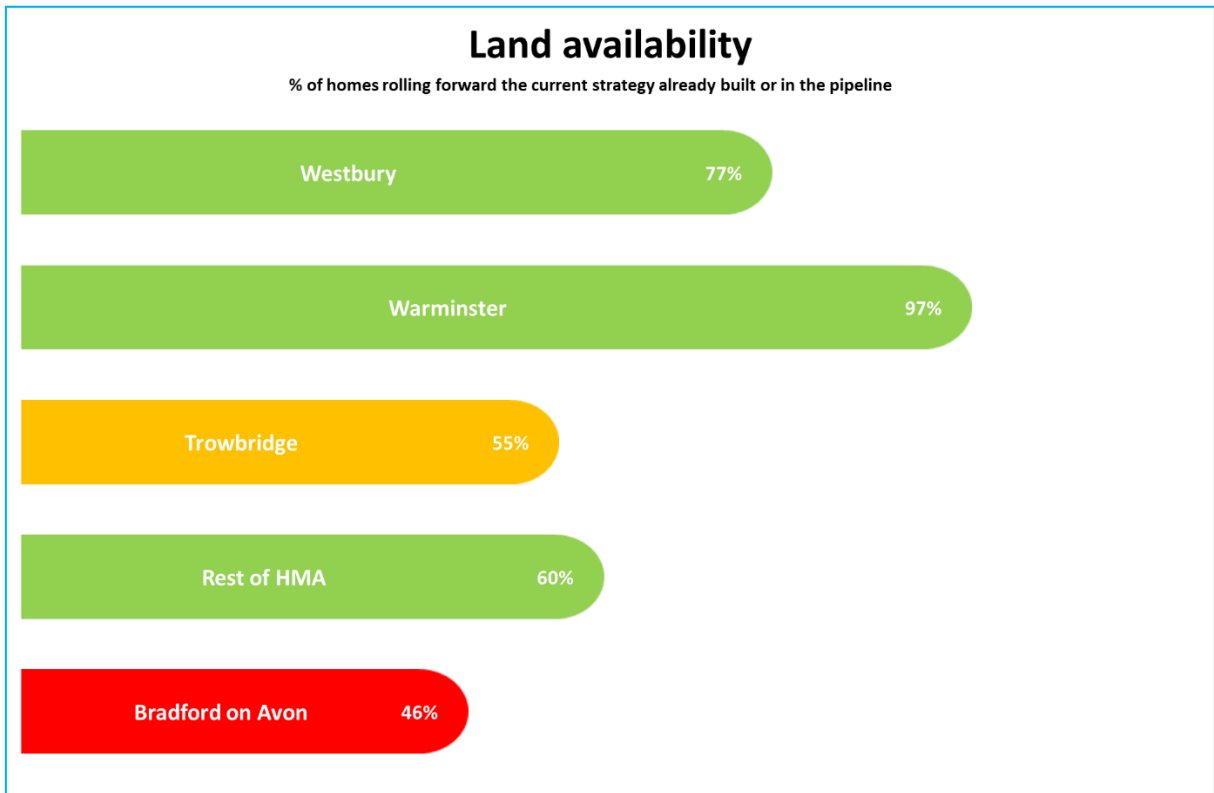


Figure 3 Housing Land Availability (2018)

66. All the other settlement have around a half or more of what would be needed to roll forward the current strategy. The lowest supplies of land are at **Bradford on Avon** and **Trowbridge**.
67. **Land availability - Land promoted for development** A relatively large amount of land for housing development is being promoted at **Westbury**. Compared to what would be needed to roll forward the current strategy, a significant amount of land is promoted at **Warminster** ; much less is being promoted at **Bradford on Avon** and **Trowbridge**.

Principal Settlement/Market Town	Outstanding Planning Permissions at April 2018	Outstanding Allocations at April 2018	Developable supply 2018-2036	Land promoted for development			Total
				Short term	Medium term	Long term	
Bradford on Avon	160	11	171	448	82	61	763
Rest of HMA	130	101	231	-	-	-	231
Trowbridge	313	2924	3237	4725	1152	360	9475
Warminster	284	1420	1704	1046	1129	896	4775
Westbury	743	145	888	6442	311	819	8460
TOTAL	1630	4601	6231	12662	2674	2136	23703

Table 9 Housing land availability

Conclusion

68. More limited land supply may make it more difficult to achieve a housing delivery that rolls forward the current strategy at **Bradford on Avon** and **Trowbridge**. Conversely, it would

seem much easier at **Warminster** where much of the land needed to roll forward the current strategy has already been given consent or has been allocated. Increased rates of development seem capable of being achieved at **Westbury** with three quarters of what would be needed to roll forward the current strategy already identified, and a large pool of land being promoted. The same would seem to apply to the **rest of the HMA** because of the large proportion of land already allocated or with planning consent.

Employment

69. **Trends - Past development trends** – if the pattern of employment development that has taken place differs to what the current strategy intends, this might indicate the need for alternatives. Employment land requirements can be distributed within the HMA according to the pattern of recent development and compared to the distribution suggested by rolling forward the current strategy. The graph below highlights the differences.
70. The principal settlement of **Trowbridge** is underperforming in terms of employment growth. A continuation of past trends would result in a significant difference to the projected share under the current strategy, and the current strategy would therefore not be deliverable. The same applies but in much smaller amounts of land to **Bradford on Avon**, and to a lesser extent **Warminster** and **Westbury**. The **rest of the HMA** has also exceeded strategy requirements.

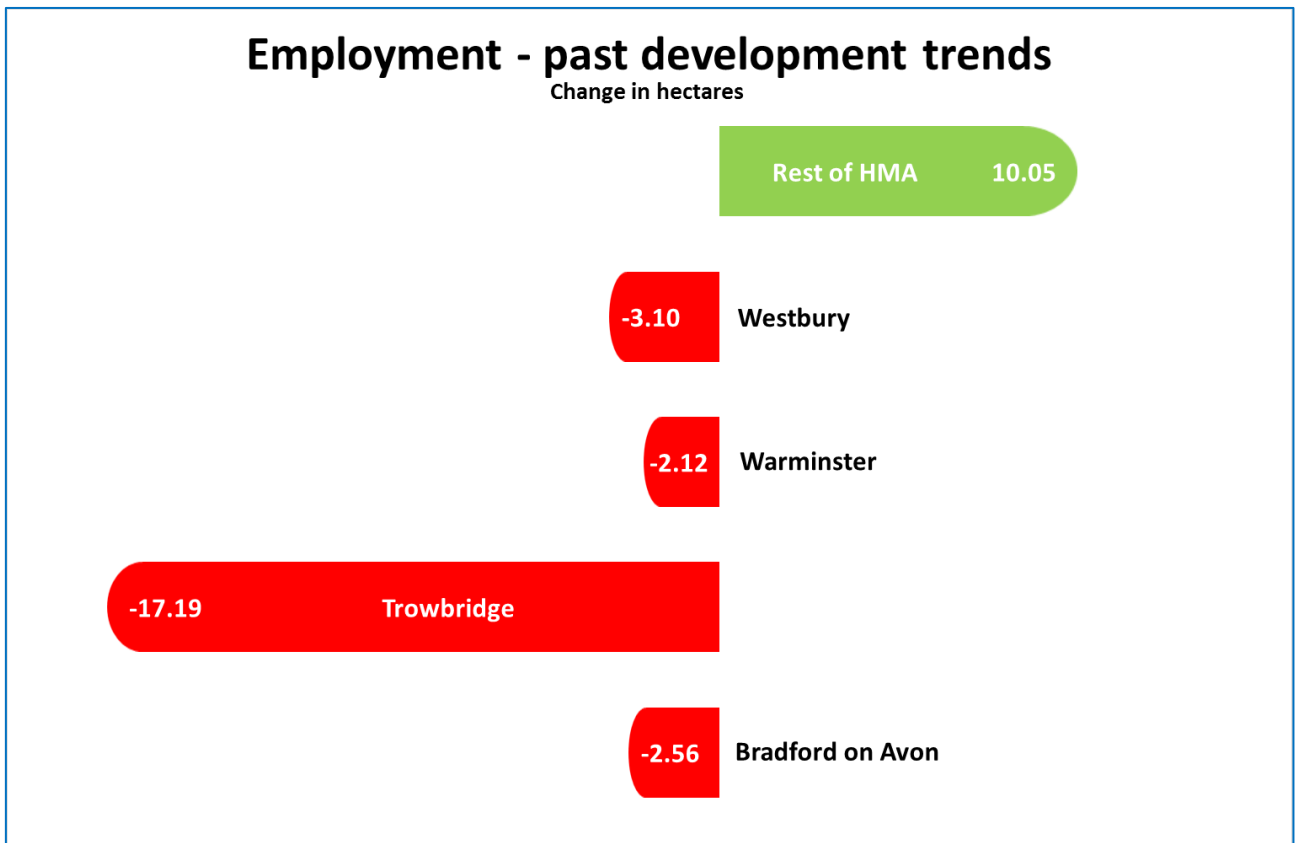


Figure 4 Employment - past development trends (2006-2018)

71. **Land availability - Land allocated or with consent.** Further evidence that complements these findings can be drawn from 'deliverable supply', the land available for employment development i.e. unimplemented planning permissions and plan allocations for employment

development considered capable of delivery within five years. This may point to investments in the pipeline that might also suggest change in a local economy and market preferences.

72. If a high proportion of land needed to roll forward the current strategy is already in the pipeline, then this might suggest strong demand and exploring alternatives for higher amounts of employment land. Where the opposite occurs, this might indicate less market confidence from land owners and prospective developers and alternatives for less growth.
73. Deliverable supply has all the land needed to carry forward the current strategy and revised forecasts for the plan period, throughout the HMA, including the **rest of the HMA**. Only in **Bradford on Avon** is there a very slight shortfall (less than one percent).

Economic Aspects

How would growth be distributed if it was led by forecast employment land needs?

74. The ELR produced different scenarios for the demand for employment land over the plan period¹¹. Scenarios are based on the current distribution of employment, past job growth and market signals. This comparison provides some insight into how the distribution might need to be different to rolling forward the current strategy in terms of both housing and land for employment development.

Housing

75. **Housing** – economic forecasts, produced by the ELR, provide a distribution of job growth that can be translated into a distribution of housing requirements within the HMA. This is compared to the distribution that results from rolling forward the current strategy. Comparing one with the other can indicate where the prospects for growth of each settlement, in terms of economic development, may differ from those suggested by the current strategy direction.
76. Economic growth less than the current strategy can imply less settlement self-containment. Lower housing growth might constrain future economic growth and increase local affordability issues. Worsening imbalances either way implies increased levels of commuting.
77. There are some settlements where economic prospects would not appear to match those implied by rolling forward current strategy.
78. The comparisons show forecasts of very much stronger economic performance in the **rest of the HMA** and **Bradford on Avon**. To lesser a degree job growth appears stronger at **Westbury** than suggested by rolling forward the current strategy.
79. The opposite is the case for **Trowbridge** and **Warminster**. A lack of land for employment available for development may, however, be a contributory factor. Each settlement is relying on the development of a strategic site to provide fresh land for employment

¹¹ ELR Appendix 5 page 14

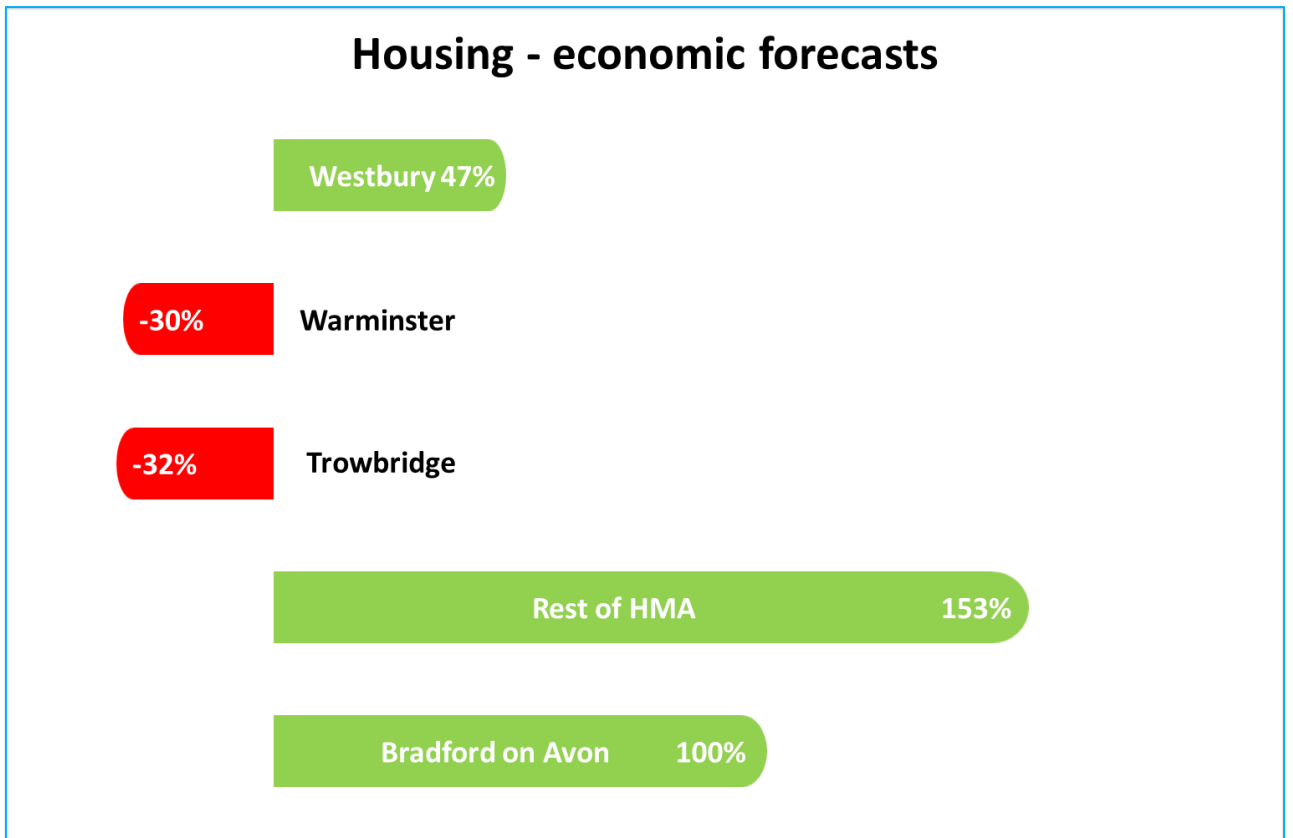


Figure 5 Housing - economic forecasts

Employment

80. This assessment looks at employment land supply and how this might change from rolling forward the current strategy to match economic scenarios forecasting economic growth. Employment land supply would need to be increased in **rest of the HMA** and markedly decreased at **Trowbridge** and **Warminster**. To a much lesser degree it would also be decreased at **Westbury** but increased at **Bradford on Avon**.

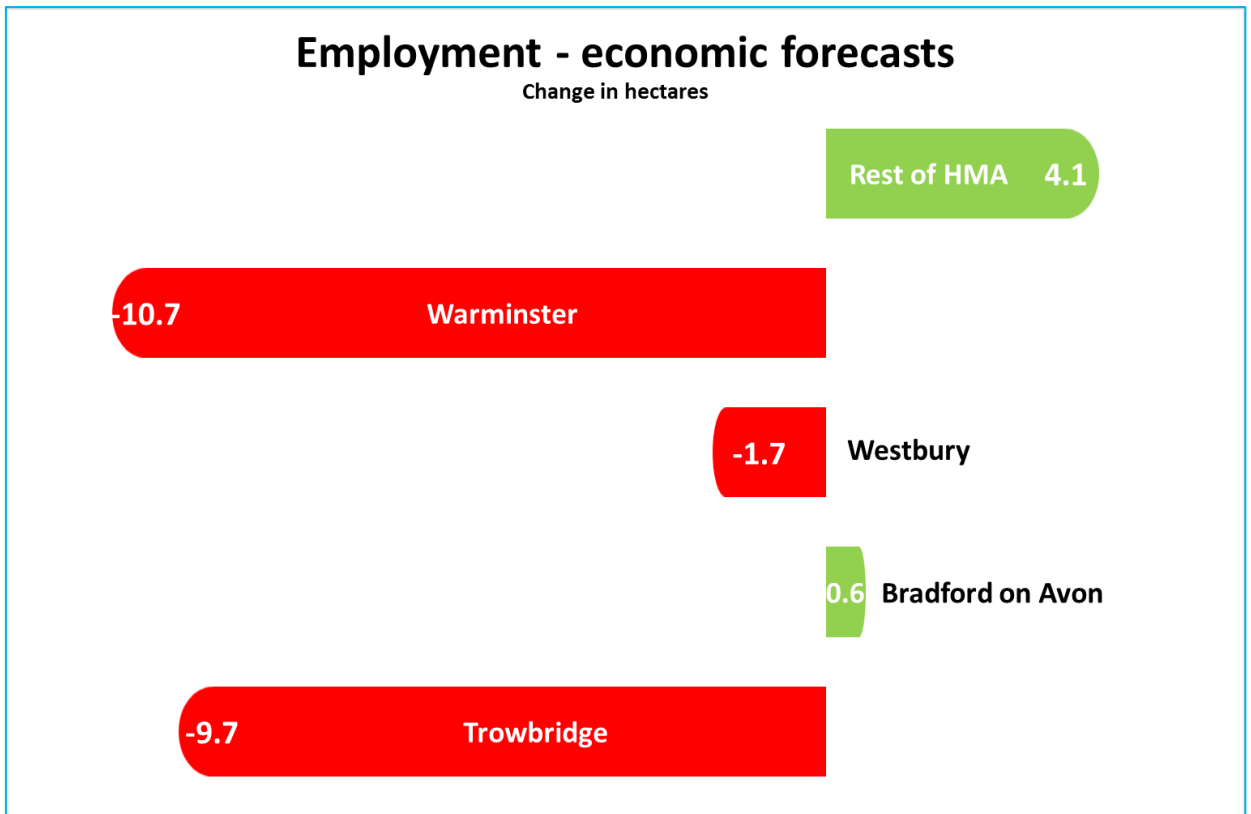


Figure 6 Employment - economic forecasts under ELR market-led scenario

Social Aspects

How well does the distribution of housing match where people live and registered affordable housing needs?

81. **Population** - This analysis compares the population distribution of the HMA to the distribution of housing if the current strategy was rolled forward.
82. Most needs for new homes will arise where most people live. The analysis shows how much the current population distribution suggests a higher or lower proportion of growth than that suggested by rolling forward the current strategy.
83. **Affordable housing** - Delivering affordable housing is an important outcome sought by the Local Plan. The housing register, at any point in time, provides a snapshot of the distribution of the need for affordable dwellings. The analysis compares a distribution based on need, as expressed on the register, with rolling forward the current strategy and suggests where scale of growth might need to be higher or lower.
84. **Population** - The most striking conclusion of a comparison with the distribution of population, is the proportion living in the **rest of the HMA**. It indicates potentially that a greater allowance for new homes should be made for rural settlements.

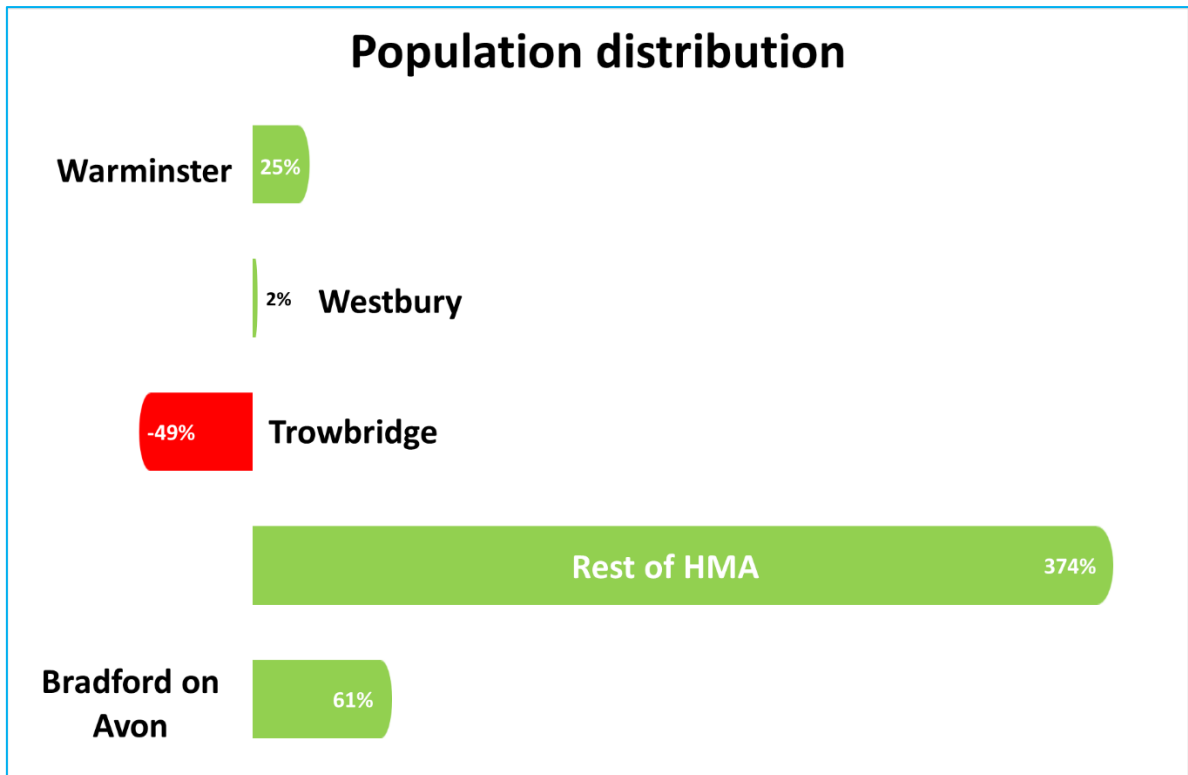


Figure 7 Housing - population distribution (est 2016)

85. This comparison suggests there should be less concentration on **Trowbridge**, whilst the focus might increase at **Warminster** and **Bradford on Avon**.
86. **Affordable Housing** - The pattern of needs for affordable housing, as measured by a snapshot of preferences¹² listed on the Council's housing register suggest less support for housing to match affordable housing needs in **Trowbridge** compared to everywhere else in the HMA. Again, and also to a lesser degree, there is less support for housing to meet needs for affordable housing at **Westbury**.
87. Higher housing provision in order to meet needs for affordable housing needs is suggested at **Bradford on Avon** and **the rest of the HMA**; and to a lesser degree at **Warminster**.

¹² Preferences on the register at September 2017

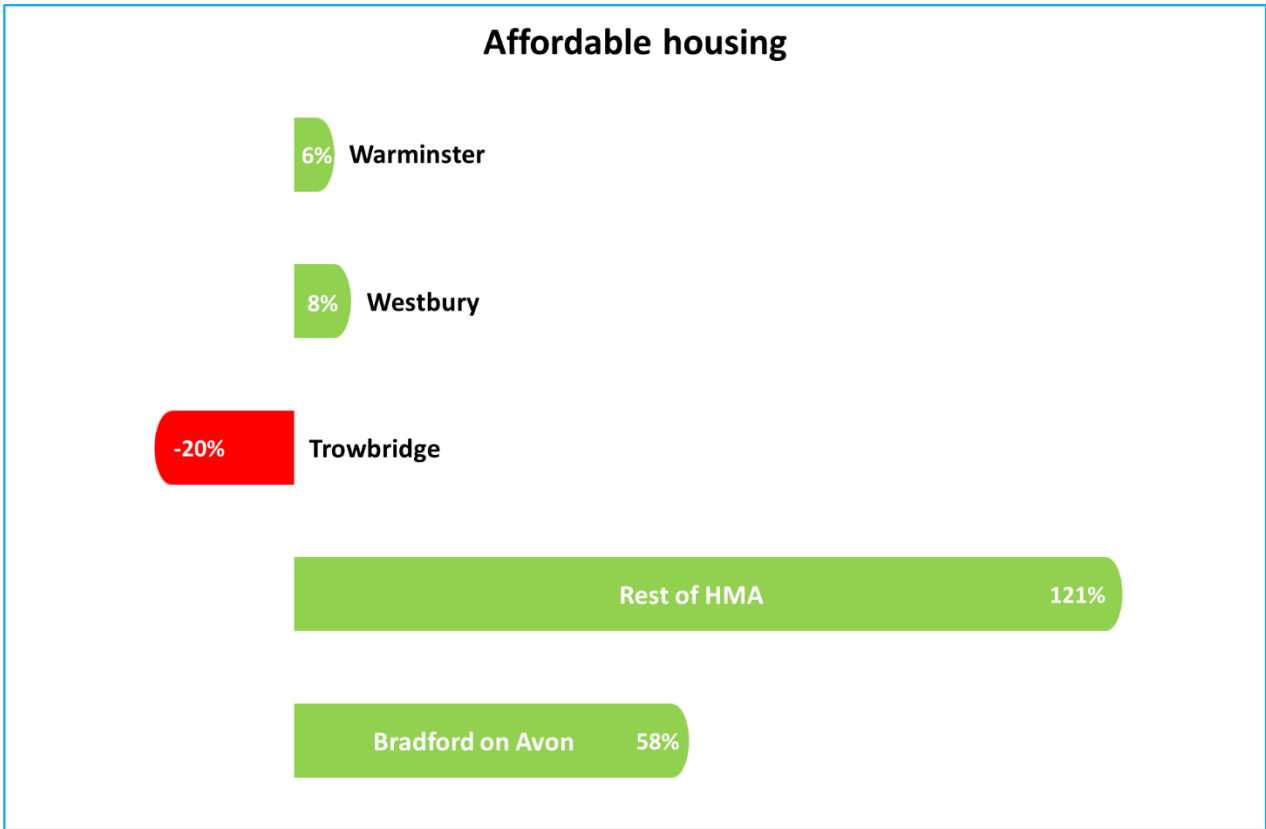


Figure 8 Housing - affordable housing (Sept 2017)

Conclusion

88. Based on this assessment, more housing should be focussed on the **rest of the HMA** outside of the main towns. There would be fewer homes, in particular, at **Trowbridge** and **Westbury**. A greater focus on **Bradford on Avon** is suggested and to lesser degree at **Warminster**.

Alternative Development Strategies

89. The information collated in relation to all three areas of assessment inform a judgement about what options for growth at a particular place should be ruled out as unreasonable alternatives. For example, the town should accommodate less growth because of the high risk of unacceptable impact on a nationally protected habitat. Or a town could accommodate about the same or more growth because there is limited risk of environmental harm and a significant market led interest. The assessment may however also show little evidence to change the current strategy. In some cases the results can also pull in opposite directions: there may be forecasts that support increased growth, but environmental or infrastructure constraints suggest less.

	Place based assessment							Assessment of potential scales of growth					
	Environmental aspects				Infrastructure			Deliverability		Economic aspects		Social aspects	
	Biodiversity	Landscape	Heritage	Flood risk	Education	Transport	Consultation	Trend	Land availability	Housing	Employment	Population	Affordability
Trowbridge	Red	Red	Red	Yellow	Red	Green	Red	Yellow	Yellow	Red	Red	Red	Red
Bradford on Avon	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Yellow	Green	Green
Westbury	Yellow	Yellow	Yellow	Green	Green	Green	Green	Yellow	Yellow	Green	Yellow	Yellow	Red
Warminster	Red	Red	Red	Yellow	Yellow	Green	Yellow	Red	Green	Yellow	Red	Green	Green
Rest of HMA								Yellow	Green	Green	Green	Green	Green

Indicators for growth	
Higher	Green
Neither higher or lower	Yellow
Lower	Red
No information	

Table 10 Summary of results

90. The assessment takes into consideration economic, social and environmental factors as well as delivery and infrastructure constraints. A settlement might accommodate less growth because of the high risk of unacceptable impacts on a nationally protected habitat. The assessment may show little evidence to change the current strategy, but in some cases the results could also pull in opposing directions. There may be forecasts to support increased growth, but environmental or infrastructure constraints also suggest less. In summary, the assessment process suggests alternatives that should include the following:

Locations	Summary Conclusion	Higher or lower than rolling forward the current strategy

Trowbridge	Across the indicators used in this assessment it is appropriate to test a strategy with lower rates of growth than would be the case taking forward the current strategy.	Lower
Bradford on Avon	Taking forward the current strategy suggests increasing rates of development and the assessment of potential scales of growth suggest possibly still higher rates, judging by growth assessment indicators. However, the extent and nature of environmental constraints affecting the settlement suggest that lower rates of growth should also be tested.	Lower
Warminster	Environmental risks suggest testing lower rates of growth. Infrastructure support for still higher growth is uncertain. Assessments of potential scales of growth, significantly those based around the economy, do not give clear support to testing higher rates.	Lower
Westbury	With relatively less environmental risks involved with growth than other settlements, it could be appropriate to test higher rates of development. Key infrastructure indicators suggest the possibility of higher rates. Although higher rates of growth are not clearly supported by the results of growth assessments, economic forecasts however do support higher rates.	Higher
Rest of HMA	Whilst impossible to assess environmental risks at this stage, assessments, not least evidence that past house building exceeds rates planned in the current strategy, supports testing higher rates of growth.	Higher

Table 11 Summary of conclusions

Alternative Development Strategies

91. Using these reasons and assumptions the following alternatives allow testing of a range of choices about the future of the area.
92. Based on existing supply and forecast scale of need for employment land additional requirements are set only where necessary to test where the evidence has identified specific needs.

TR-A Roll forward the Wiltshire Core Strategy Distribution of homes and jobs

Method

Housing and employment land requirements are decreased by 4% and distributed pro-rata rolling forward the current strategy

Justification

The current strategy distribution has not been challenged as unreasonable, although there may be issues to resolve to ensure its delivery.

Apart from Trowbridge and Bradford on Avon, the scale of additional land required to accommodate new homes is relatively modest, as much already either has planning permission or is allocated.

The scale of development envisaged for the rest of the HMA would be modest and allow a number of sites determined in large part through the preparation of Neighbourhood Plans geared to meeting local needs. The scale of development implies lower rates of house building at rural communities than the past decade.

Risks

The approach duplicates the current WCS distribution without reviewing its effectiveness. Housing delivery has been slow at Trowbridge largely because of the lead in time to deliver a complicated mixed use allocation. The scale of further development could give rise to similar issues.

The most significant set of risks however spring from the possibilities for unacceptable environmental harm at Trowbridge and Bradford on Avon. Scope for outward expansion is also limited at each settlement by the strategic priority to protect green belt designated areas.

Settlement Area	Housing		Employment
	Requirement	Residual	Residual
	Dwellings		Hectares
Bradford on Avon	570	310	1
Trowbridge	6520	2930	-
Warminster	1840	50	-
Westbury	1435	330	-
Rest of HMA	635	255	-
TOTAL	11000	3875	1

TR- B Westbury Growth Point

Method

Housing requirements for Westbury are led by employment forecasts (from about 1,400 to about 2,100 homes). Growth continues at Core Strategy rates at Warminster and reflects assessed needs at Bradford on Avon (-4%). Consequential reductions focussed on Trowbridge.

New employment land proposed only at Westbury.

Justification

Compared to other settlements there has been stronger economic growth at Westbury justifying testing a shift in employment provision requirements. The scope for potential growth at Westbury is based on its recent track record of employment growth. The town is relatively unconstrained environmentally. Assessment will need to consider the town's relationship with nearby settlements and future infrastructure requirements.

The share of housing is reduced at Bradford on Avon and Trowbridge where the prospects for the higher rates needed to meet needs appear more difficult to achieve. This alternative however does involve some greater rural focus to the extent of continuing current the rates of house building experienced in the rural that have been higher than planned.

Risks

A significant shift to focus growth at Westbury may not be capable of being accommodated without unacceptable environmental harm or severe strains on local infrastructure. Recent growth may not be sustained by market interest in the local the economy or by house builders.

The impact of relatively slower growth at Trowbridge might undermine the vitality and viability of the town. This may occur at Bradford on Avon also. In additional, a limited supply of land here might increase pressures on housing supply and further worsen local affordability.

Settlement Area	Housing		Employment
	Requirement	Residual	Residual
	Dwellings		Hectares
Bradford on Avon	570	310	-
Trowbridge	5400	1805	-
Warminster	1950	160	-
Westbury	2130	1025	1

Rest of HMA	950	570	-
TOTAL	11000	3870	1

TR-C Focus on the rest of the HMA

Method

Housing requirements for the rest of the HMA are aligned to actual rates of past house building (from about 600 to about 1,200 homes). Warminster reflects assessed need (-4%) and Westbury continues at Core Strategy rates. Housing requirements are lower than TR-A at Trowbridge and Bradford on Avon as a result.

New employment land proposed only in the rest of the HMA.

Justification

Actual rates of housing development already exceed those envisaged by the current strategy. A greater alignment to the distribution of population might better suit future needs for housing. Consultation responses suggest current policy is too restrictive and may harm the prospects of rural communities.

This distribution could alleviate pressures for the development of land around Trowbridge and other market towns in the area.

Modelling a higher growth in employment in the rest of the HMA reflects the recent trend going forward.

Risks

A shift toward a more dispersed pattern of development might create greater stresses on local services, represent in combination an extensive loss of countryside and increase the need to travel, in particular by private car.

Settlement Area	Housing		Employment
	Requirement	Residual	Residual
	Dwellings		Hectares
Bradford on Avon	300	40	-
Trowbridge	6130	2535	-
Warminster	1840	50	-
Westbury	1530	425	-
Rest of HMA	1200	820	1
TOTAL	11000	3870	1

Annex 1 Summary of assessment method

1. The assessments look at potential impacts upon each place and how development trends compare to those anticipated by the new evidence. Impacts involve looking at what additional land requirements there would be for growth over and above what can already be accounted for with planning consent or plan allocations. The results of public consultation also help to highlight where alternatives may need to be considered because this has raised new issues and opportunities. As mentioned above, the result of each assessment method might indicate a higher or lower rate of growth in the future for a particular settlement. The assessment takes into consideration economic, social and environmental factors as well as delivery and infrastructure constraints.

Potential impacts <i>Place based assessment</i>	Development trends <i>Assessment of different scales of growth</i>
<p>Biodiversity: what is the risk of harming local biodiversity?</p> <p>(Source: advice from specialists based on published information)</p>	<p>Trends: How does forecast housing need compare with what has actually happened?</p> <p>(Source: implied future rates of development compared to actual past rates)</p>
<p>Landscape: what are the risks of harm to the character and attractiveness of the local landscape?</p> <p>(Source: advice from specialists based on published information)</p>	<p>Land availability: Is there land to continue the current strategy?</p> <p>(Source: future scale of housing and employment need compared to the amount already committed)</p>
<p>Heritage: what is the risk of harming heritage assets?</p> <p>(Source: advice from specialists based on published information)</p>	<p>Economy: housing and employment</p> <p>Do economic forecasts predict a need for more employment land or new homes than the current strategy?</p> <p>(Source: rolling forward the current distribution of development compared to forecast pattern of job growth)</p>
<p>Flooding: what is the likelihood of unacceptable risks of flooding?</p> <p>(Source: advice from specialists based on published information)</p>	<p>Social: population and affordable housing</p> <p>Are homes provided where people live and where there are the most needs for affordable homes?</p> <p>(Source: rolling forward the current strategy compared to the distribution of the population and registered needs for affordable homes)</p>
<p>Infrastructure: can the current strategy be supported by secondary school capacity and the local transport network?</p> <p>(Source: advice from specialists based on published information. An estimate of the number of years until secondary capacity is reached.)</p>	

Consultation responses: what are the new issues and opportunities?

(Source: summary reports of public consultation)

Annex Two Transport Assessment Definitions

Rail Station

Defined as located within the urban extent of the settlement and has a usable passenger function. Affording residents direct access to the passenger rail network, for Wiltshire and national journeys.

Key Bus Route Network

As defined in Core Policy 2, Fig 4.1A. A settlement should have at least 1 Key Bus route within the urban extent of the settlement. The KBRN gives residents a regular public transport option to key destinations both locally and within the South West. Where the KBRN is not located directly within the settlement some officer judgement has been used to enable access to the network by reasonable walking distance (est. 400m).

Freight Network

As defined in Wiltshire Freight Strategy 2011-2026, the advisory freight network is included as a factor of the level of servicing a new development (both in construction and occupation) that may be required and ensuring that such developments have access to preferred routes for HGV traffic. Settlement should have at least 1 advisory freight route within the urban extent of the settlement. Some officer judgement has been used to enable access to this network by reasonable estimated direct road distance (500m), where the route does not fall directly within the settlement boundary.

Primary Route Network

The primary route network (PRN) designates roads between primary destinations with the aim of providing easily identifiable routes to access the whole of the country. Primary routes are marked green on most road maps, as opposed to the more common red of an ordinary A road. The inclusion of PRN recognises the settlements linkage to the wider road network and its potential for further capacity. Settlement should have at least 1 PRN within the urban extent of the settlement. Some officer judgement has been used to enable access to this network by reasonable estimated direct road distance (500m), where the route does not fall directly within the settlement boundary.

Town Cycle Network

As defined in Wiltshire Council Cycle Strategy 2014, Appendix 1 To enable residents within a settlement access to easy internal and inter-urban journeys servicing new and existing developments.