



# Wiltshire Council **LOCAL PLAN**

## Looking to the future

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



Wiltshire Local Plan Review

# **Formulating Alternative Development Strategies - Swindon 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<sup>1</sup>. 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 each.
3. This paper sets out the conclusions of various assessments to identify reasonable alternative development strategies in the Wiltshire part of the Swindon 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.

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<sup>1</sup> Swindon and Wiltshire Local Housing Needs Assessments 2018-19, ORS, (April 2019)



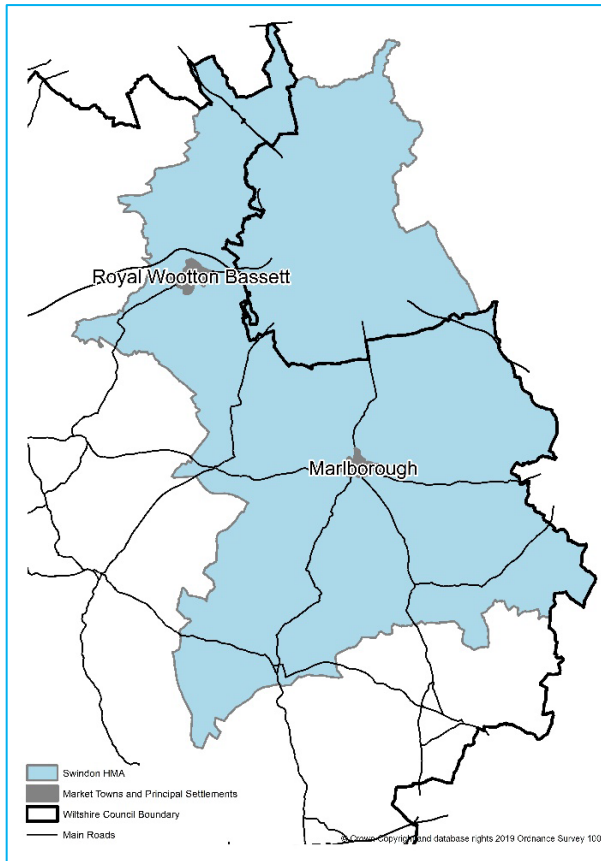


Figure 1 Swindon Housing Market Area

5. The process is carried out through comparison with rolling forward the current spatial strategy (as set out in the Wiltshire Core Strategy (WCS)). 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 method<sup>2</sup>. 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 aspects<sup>3</sup>. 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. The Local Housing Needs Assessment provides a forecast for the whole of the Swindon HMA, including Swindon Borough, which is lower for the period 2016 -2036 than established in the core strategy for the period 2006-2026, as shown in table 1 below. The forecast is divided between local authority areas. Each authority has agreed that its share will be met within its boundaries.
12. In the Wiltshire part, or outer Swindon HMA, there would be a 16% decrease in the number of dwellings needed over the next 20 years compared to that planned for 2006-2026. It is this HMA for which alternative development strategies may need to be tested
13. As well as providing indicative requirements for development at Marlborough and Royal Wootton Bassett, the Wiltshire Core Strategy also included a scale of housing development permitted west of Swindon. The starting point is to continue to consider this location separately in the same manner as part of the current spatial strategy.

<b>Principal Settlement/Market Town</b>	<b>Wiltshire Core Strategy 2006-2026</b>	<b>Rolling Forward the current strategy</b>
	Dwellings	Dwellings
<b>Marlborough</b>	680	570
<b>Royal Wootton Bassett</b>	1070	900
<b>West of Swindon</b>	900	755
<b>Rest of HMA</b>	1225	1030

<sup>2</sup> 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)

<sup>3</sup> Swindon and Wiltshire Local Housing Needs Assessments 2018-19, ORS, (April 2019), figure

<b>Total</b>	3875	3255
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Table 1 Housing Requirements - Rolling forward the current strategy for 2016 - 2036

14. 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) 2016<sup>4</sup> supplemented by the 2018 Wiltshire Employment Land Review (ELR)<sup>5</sup>. The employment land requirement total has been distributed according to the equivalent share of employment under the current strategy for the period 2016-36.
15. There would be a 30% increase in the amount of employment land compared to 2011-26

<b>Principal Settlement/Market Town</b>	<b>Wiltshire Core Strategy 2011-26</b>	<b>Rolling forward for 2016-36</b>
	Ha	Ha
<b>Marlborough</b>	3	4.3
<b>Royal Wootton Bassett</b>	3.7	5.3
<b>West of Swindon</b>	0	0
<b>Rest of HMA</b>	1	1.4
<b>Total</b>	<b>7.7</b>	<b>11</b>

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

<sup>4</sup> Swindon and Wiltshire Functional Economic Market Area Assessment Associates (2016)

<sup>5</sup> Wiltshire Employment Land Review, Final Report, Hardisty Jones Associates (April 2018)



## Context

16. 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 place<sup>6</sup>.
17. 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 follows<sup>7</sup>:

<b>Principal Settlement/Market Town</b>	<b>Dwellings completed, with planning permission or allocated April 2018</b>
<b>Marlborough</b>	361
<b>Rest of HMA (Wiltshire part)</b>	407
<b>Royal Wootton Bassett</b>	256
<b>West of Swindon</b>	481
<b>Total</b>	1505

Table 3 Current Housing Commitments

## Wiltshire Employment Land Review

18. 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 (FEMA) 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 sufficient supply of sites in Wiltshire over the period to 2036.

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

<sup>7</sup> 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.

19. 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.

## **Assumptions**

20. At face value, much of the need for new homes has been built or will be met by the current supply of identified land. This however may not be appropriate. The location of sites for housing may need to better match the distribution of need. Sites in the current land supply may have become unsuitable.
21. In so doing several assumptions have guided the process

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### **Assumptions**

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For the purpose of assessment and formulating alternative development strategies 'West of Swindon' is treated as a part of the Swindon built up area. It is assumed therefore that there is secondary education capacity to meet current commitments and the location has transport accessibility.

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

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This assessment represents a first stage. A further step will look more closely at cross boundary issues with Swindon Borough and possible alternatives suited to the complete Swindon HMA.

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Table 4 Assumptions

# Place based assessment

## Environmental Impacts

22. 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 completions and commitments that are shown in table three are taken off. This gives a better indication of the impact of likely revised requirements on the environment in and around a settlement.
23. A high-level environmental assessment is made in four topic areas:
  - Biodiversity
  - Flood risk
  - Heritage
  - Landscape
24. 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).
25. 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.
26. 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.
27. The Wiltshire Core Strategy included a scale of housing development permitted west of Swindon. The starting point is to consider this location separately in the same manner as part of the current spatial strategy.
28. The conclusions in summary are shown in the table below:

	Biodiversity	Landscape	Heritage	Flood Risk
<b>Marlborough</b>	Yellow	Yellow	Yellow	Red
<b>Rest of HMA (WC)</b>	White	White	White	White
<b>Royal Wootton Bassett</b>	Green	Green	Green	Yellow
<b>West of Swindon</b>	Yellow	Yellow	Green	Green

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

## Conclusions

29. Rolling forward the current strategy was seen generally as presenting moderate to low levels of environmental risk. This is largely due to the high proportion of land that has already been identified and, consequently, its environmental effects already having been considered in detail. Sites identified with planning permission or allocated have already had mitigation attached to them and are considered acceptable in environmental terms.
30. The potential for growth at **Marlborough** is constrained by its location within an Area of Outstanding Natural Beauty. In particular the presence of river corridors, steep valley sides and sensitive skylines reduce scope. There are possible issues with bat flight lines to and from the disused railway tunnel. A main issue is the extent of flood risk areas. There is also considerable groundwater vulnerability surrounding the area.
31. At **Royal Wootton Bassett** there are less direct impacts. Possibilities for urban expansion should prevent coalescence with Swindon. There is also a risk of coalescence with the rural settlement of Hook. To the south east lowland farmland provides separation from the scarp slopes of the Area of Outstanding Natural Beauty. Storm and surface water flows will have to be carefully managed.
32. At **West of Swindon** further urban encroachment risks coalescence with outlying rural settlements. There are several environmental constraints including biodiversity issues related to river corridors and landscape considerations. There is potential for significant adverse effects on North Meadow and Clattinger Farm Special Area for Conservation (SAC).

## Infrastructure constraints and opportunities

33. 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.
34. 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.

35. 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
36. Main settlements have been classified per their access to a range of transport modes (a rail station, bus services etc). Settlements with the most access 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.

<b>Principal Settlement/Market Town</b>	<b>Education (years before a new secondary school)</b>	<b>Transport (settlement accessibility level)</b>
<b>Marlborough</b>	28.7	4
<b>Rest of HMA (Wiltshire part)</b>	n/a	1
<b>Royal Wootton Bassett</b>	2.9	3
<b>West of Swindon</b>	n/a	5

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

37. There will need to be additional secondary school capacity at **Royal Wootton Bassett** in the plan period to support growth more than current commitments. There are no known obstacles to growth from education constraints at other locations under consideration. They would need further more detailed investigation.
38. **Royal Wootton Bassett** does not have a rail station and is not located on the primary route network. **West of Swindon** as a part of the wider built up area is assumed to have access to the town's rail station and access to the primary route network. **Marlborough** does not have a rail station

## Conclusion

39. With a good proportion of development already in the pipeline, many infrastructure needs have already been considered and factored in.
40. The lack of school capacity at **Royal Wootton Bassett** is potentially a significant constraint to further growth that might suggest lower rates of growth. There would appear to be scope to support higher growth in terms of secondary school capacity at **Marlborough**.

41. In terms of existing transport infrastructure **West of Swindon** seem best served and preferable to **Royal Wotton Bassett**. Growth in all the outer Swindon HMA, however, will need to consider the transport infrastructure to support relationships with Swindon.



# Public consultation

## Issues Consultation 2017

42. 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.
43. 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 Questions	Consultation response
<b>Marlborough</b>	Should the current strategy continue or could some additional measures ensure more affordable homes and/or address traffic issues affecting the town?	<p>Marlborough, as a service centre in its own right, should accommodate the growth it needs, Swindon should be the focus for growth due to it being the main focal point for employment, particularly in respect of larger companies.</p> <p>Traffic congestion and air quality came through as significant local concerns.</p> <p>Travel/car problems with reference to parking, HGVs and pollution (AQMA) was also voiced. Investment in infrastructure is required for future growth to take place. Suggestion that infrastructure is focussed too much on Swindon in the HMA paper – Marlborough must be taken into consideration.</p> <p>Tourism industry should be acknowledged and taken into consideration. Sports and recreation facility requirement. Explained that the Neighbourhood Plan is currently ‘calling for sites’ which may give way to development opportunities.</p>
<b>Royal Wootton Bassett</b>	The dormitory function of the town is increasingly pronounced, what is a realistic strategy and role for the future of the town?	<p>While some concern was raised surrounding this issue, there was also a school of thought that suggested that a close relationship with Swindon is a positive step – given links with Swindon, Royal Wootton Bassett is well suited to accommodating additional development.</p> <p>Noted among representations that given Swindon’s success at attracting inward investment, any dormitory relationship is likely to continue to an extent – the focus should be on making this relationship as sustainable as possible.</p> <p>Gap between Royal Wootton Bassett and Swindon needs to be taken into consideration and development towards J16, M4 should be minimised to respect this sense of separation. Royal Wootton Bassett has a cultural identity which is profoundly separate to Swindon and it is feared that a breakdown in coalescence could lead to a breakdown in the special community spirit in Royal Wootton Bassett.</p>

Town	Issue – Consultation Questions	Consultation response
	How can more infrastructure, local services and jobs be provided?	<p>Education provision needs to be taken account of and the requirements to meet future demands need to be clear – do we need expansion of current school or an urban extension to accommodate a new school.</p> <p>Transport was a widely reported subject. Some expressed that this needs careful consideration and should not necessarily direct development. New station is highly complex and costly project – network rail only awarded funding to 5 new station projects in 2017. Many representations expressed the need for future development to support the delivery of a railway station and the benefits this would provide to not only Royal Wootton Bassett, but also the wider community.</p> <p>However, identification of this project was widely welcomed and people felt a railway station would have significant sustainability benefits for the whole HMA.</p> <p>Requirement for a bypass/distributor road was mentioned. Given mention of HGV traffic being an issue, consideration should be given to a bypass around the town to alleviate this.</p> <p>Suggested that a development strategy using large mixed use allocations will enable the, or contribute to, infrastructure improvements, new facilities and employment areas. A number of potential development opportunities were submitted to us, these included opportunities for large employment allocations, land to assist the delivery of an eastern distributor road and land safeguarded for the future development of the railway station.</p>
	Lyneham (New Issue)	<p>Widely reported that there is a clear relationship between the town and Lyneham just 4 miles away and there are clear opportunities for more linkages to be made between these two settlements.</p>

Town	Issue – Consultation Questions	Consultation response
		<p>The unique settlement of Lyneham with its substantial MoD airfield and training facilities should not be ignored as a location for growth, especially given the constraints of the only other main settlement within the HMA, Marlborough.</p>
	<p>Cricklade (New Issue)</p>	<p>It was suggested that in the Swindon HMA the framework is too narrow and should be extended to include cross county borders some of which are closer than the Town of Swindon where development close to the border impacts on our area.</p> <p>Transport: concern was voiced that the road infrastructure is inadequate with this being caused by commuting into Swindon. Road infrastructure needs to be put in place to alleviate this ‘rat running’. Suggested that unless routes into and out of Swindon are improved development cannot go ahead as the B and C roads are used as through routes to the Town. Highway improvements to A419 needed to create an additional junction to take traffic to North Swindon and other areas.</p> <p>Education concerns suggested that more than 50% of children aged 11 and over in the area attend schools outside the County in Gloucestershire. Further development needs to provide sufficient places</p>
<p><b>HMA</b></p>	<p>How much of the additional housing needs of the HMA could and should be planned for within and/or at the urban area of Swindon? How can this be balanced against the objectives of respecting the environmental quality of the area for existing communities and maintaining a diversity of uses needed to support a thriving economy? Is infrastructure a constraint to such growth?</p>	<p>Support was voiced for the extension of the Swindon HMA – Swindon have struggled to build strategic allocations, this strategy enables development to be accommodated in the surrounding area.</p> <p>Widely reported that there is a need to tackle Swindon’s failure to ensure a 5year housing land supply. Comprehensive response suggested that there needs to be a balanced portfolio of large, medium and small sites with the smaller settlements located in close proximity to Swindon playing a key role in delivering relatively small scale developments earlier in the Plan period whilst the larger, more complex urban extensions come forward.</p> <p>Some raised a concern regarding the administrative boundary between the two authorities, Wiltshire Council and Swindon Borough Council. Suggested that historically the difference of political views between the two authorities has proven</p>

Town	Issue – Consultation Questions	Consultation response
HMA	What is the role of the market towns and other rural settlements within the Housing Market Area?	<p>to be a major obstacle in comprehensively planning development that is located astride the administrative boundary.</p> <p>Was also a suggestion that a review of the settlement hierarchy should be considered. The profile does not currently provide any meaningful consideration of the numerous smaller settlements which are included within the HMA. Instead of urban extensions, dispersed development of housing to towns and villages which were close to employment locations and public transport were supported.</p> <p>Concern was raised regarding the transport impacts of past a future growth on the settlements around Swindon. Congestion was reported as a problem that needed to be dealt with on the roads that lead to Swindon from these more rural settlements with high traffic volumes being reported.</p> <p>It was also mentioned, with particular reference to Purton, that consideration should be given to the opening of a railway station to provide a sustainable means of travel to alleviate travel problems.</p>

Table 7 Summary of consultation responses 2017

44. The Council also consulted on the evidence base underpinning the proposed 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.
45. Consultation responses to the FEMA highlight the need to allocate additional employment land at Marlborough to enable a new business park to come forward during the plan period. Consultees further stress the lack of suitable and available employment land at market towns. Royal Wootton Bassett is viewed to be in Swindon's sphere of influence and this could mean allocating additional employment land there. Swindon is viewed to be the main hub in this HMA and connectivity (M4, rail line) means that the Borough should be more ambitious in terms of economic growth than it has been in the past. B2 and B8 space is seen to be required to make use of its strategic position and meet business requirements.

### Town and Parish Workshops on Distribution of Growth

46. 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.

<b>Settlement</b>	<b>Summary</b>
<b>Marlborough</b>	The outcome of discussions regarding Marlborough identified a requirement for housing which met local need. In this instance, a need was identified for affordable and social housing, with a lack of need for retirement homes and large homes. It was also identified that by accommodating housing growth, new facilities should be delivered alongside the development.
<b>Royal Wootton Bassett</b>	A higher growth figure than that proposed was discussed with the assumption that it would help to ensure the delivery of improvements to road infrastructure, including a bypass, school and health facilities and improvements to bus services.
<b>West of Swindon/Rural</b>	Communities close to Swindon expressed concerns about a loss of rural character and identity if the Swindon urban area expanded. A key area of discussion for rural parish representatives were community concerns relating to traffic. Discussions on the location and amount of housing that could be accommodated in the area were mainly led by how to minimise traffic impacts and improve the use of public transport.

Table 8 Summary of consultation responses 2018



## Conclusion

47. A more dispersed pattern of development was advocated, in particular identifying roles for the smaller settlements of Lyneham and Cricklade. The former referring to opportunities at Lyneham and its relationship to Royal Wootton Bassett. Cricklade, however, is perceived to be more constrained, in particular, in terms of traffic impacts and school capacity. Nevertheless, the consultation suggests that higher rates of development should be considered in the **rest of the HMA**. Additional employment land may have to be allocated at market towns or local service centres in the remainder of the HMA.
48. There were a set of concerns around infrastructure. In terms of future growth, fresh investment was felt necessary as a pre-requisite for further growth or growth was seen as a means to achieve new infrastructure that would have a wider benefit.
49. In addition to infrastructure concerns, issues were raised around air quality at **Marlborough**, suggesting lower rates of development might be appropriate to consider. Additional employment land should be allocated at the town.
50. Infrastructure was also a concern at **Royal Wootton Bassett** but also suggestions for a by-pass and a new rail station. Some views suggested that the town's links to Swindon will continue and should be made more sustainable. This would tend to suggest testing higher rates of development, including employment.
51. **West of Swindon** was not raised separately to comments on the whole of Swindon but concerns were expressed about pressures to extend the urban area and coalesce with outlying settlements. Prospective developers raised the opportunities to extend Swindon's urban area with development sites that would help to contribute to a mixed portfolio of different sizes and so support higher rates of growth; largely to help meet Swindon Borough's needs. This would not strongly suggest either a higher or lower rate of growth.

## Assessment of potential scales of growth

52. These 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.
53. 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.
54. 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 were people live? Is it capable of meeting different needs for homes – in particular affordable homes

## Deliverability

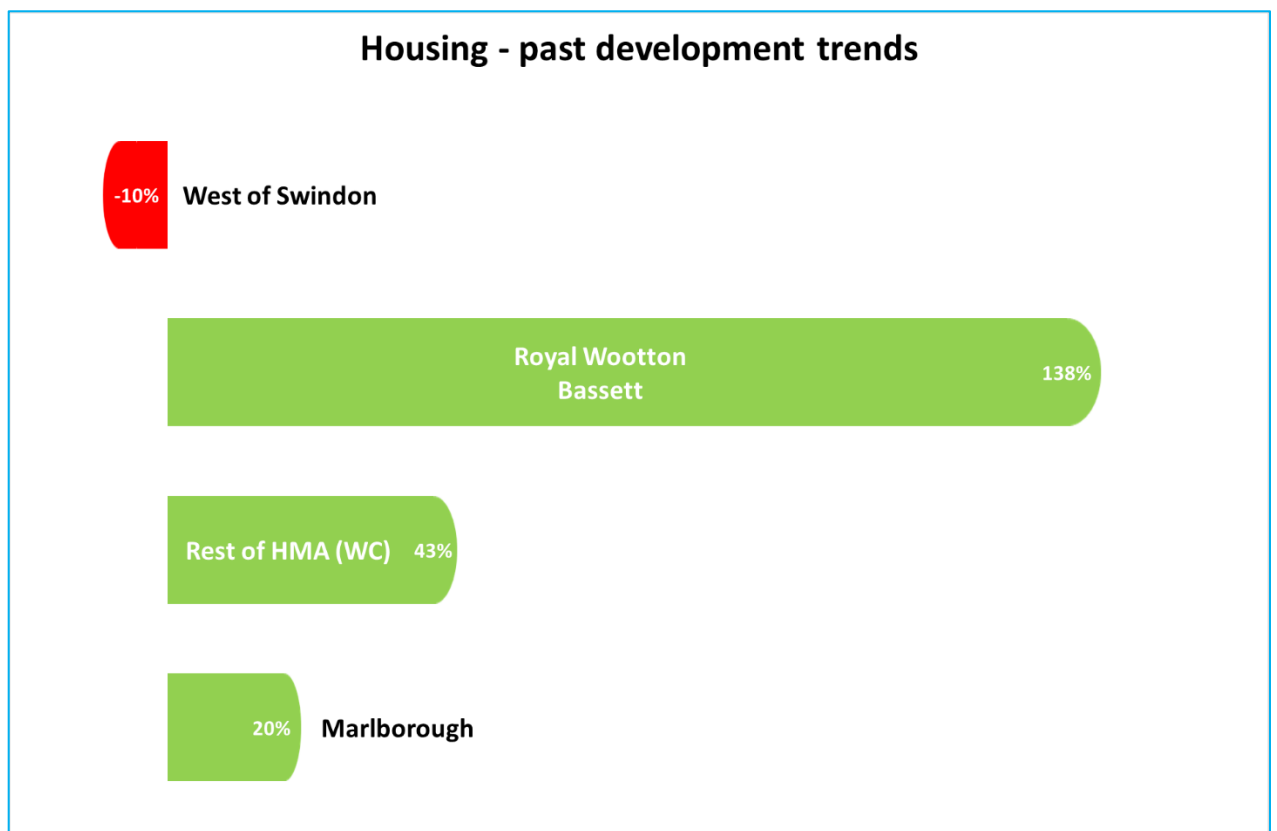
### **Do recent trends, current commitments and available land indicate that the current strategy can be delivered?**

55. Whether a future strategy is realistic and achievable depends upon several factors. This section looks at three:
56. **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.
57. **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.
58. **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.
59. 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

60. Future housing need forecasts a decrease in homes over the plan period. If scales followed past trends there would be higher rates of housing development throughout the HMA, with the exception of **West of Swindon**.
61. Past trends suggest significantly higher rates of housing growth at **Royal Wootton Bassett** than forecast need if the current strategy was rolled forward. A higher rate would be suggested in the **rest of the HMA** too. This possibly suggests higher rates of growth for each.
62. To continue past trends in **Marlborough** would roughly continue rates of housing development implied by the current Wiltshire Core Strategy.



1. Figure 2 Housing - past development trends

63. Adjusting to a reduced scale of need would lead to a decline in rates of housebuilding. This could worsen the affordability of homes and the resilience of rural communities. An alternative development strategy option would be, therefore, to increase the proportion of homes directed to the rural areas compared to the current distribution in the Wiltshire Core Strategy.
64. **Land availability - Land allocated or with consent** - There are large amounts of land allocated or with planning permission for residential development. Overall, 60% of the land required to roll forward the current strategy has already been developed, has planning permission or has been allocated. The graph below shows how much of

the land needed to roll forward the current strategy is already in the pipeline at 1 April 2018.



Figure 3 Housing Land availability (2018)

65. Compared to requirements if the current strategy was rolled forward, existing supply is low at **Royal Wootton Bassett**. Much higher proportions are available in the **rest of the HMA, Marlborough and West of Swindon**. Each of these locations has around half of the supply they would need already committed.
66. Significant fresh allocations would be needed at **Royal Wootton Bassett** that may be difficult to accommodate and complex to deliver. This suggests potential issues achieving delivery rates. On the other hand, supply elsewhere would appear to be much less problematic.
67. **Land availability - Land promoted for development** - As well as land already in the pipeline, a substantial amount of land is being put forward for further development at each of the main settlements. Market interest would suggest higher levels of growth could be achieved over the plan period. This would be the case in particular at **Royal Wootton Bassett** and **West of Swindon** where a large area of land is being put forward as capable of development in the short term. This would suggest the potential for higher rates of growth in the plan period.

Settlement	Land promoted for development					TOTAL
	Outstanding Planning Permissions at April 2018	Outstanding Allocations at April 2018	Short term	Medium term	Long term	
<b>Marlborough</b>	285	45	690	48	20	802

<b>Rest of HMA (Wiltshire only)</b>	399	157	-	-	-	157
<b>Royal Wootton Bassett</b>	68	0	4967	5651	271	10889
<b>West of Swindon</b>	177	0	5352	-	-	5352
<b>Total</b>	929	202	11009	5699	291	2929

Table 9 Housing Land Availability (2018)

68. The amount of land potentially available for development only gives one broad indication of deliverability. Further much more detailed assessment is necessary, but it can be inferred that the more opportunities there are, the greater will be choice and competition improving the chances of higher rates of house building being achieved.

## 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.

### 2. Trends - Past development trends

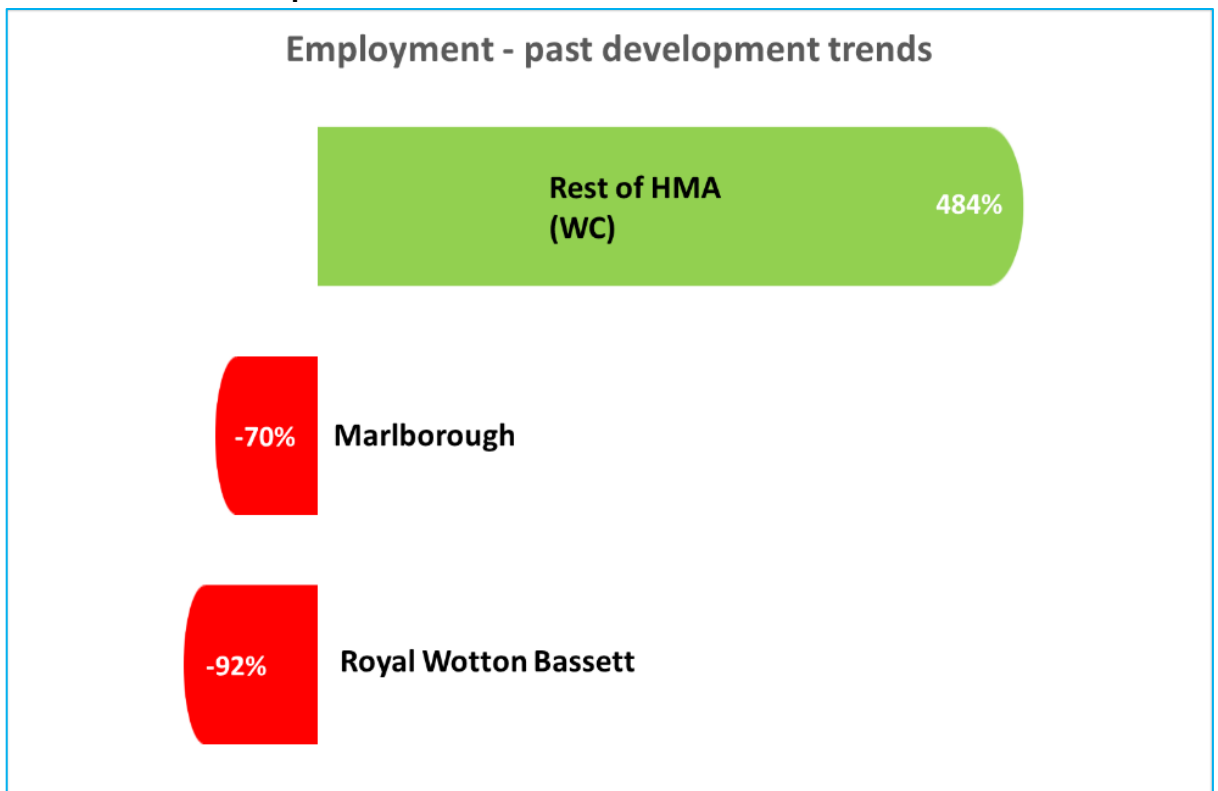


Figure 4 Employment - past development trends (2006-2018)

70. Past trends show significantly more employment development in rural areas and much less in the towns compared to rolling forward the current strategy. In order to match the current strategy, significant increase in employment land delivery would have to take place in Marlborough and Royal Wootton Bassett.

71. **Land availability - Land allocated or with consent** . Available land for employment development is overwhelmingly in the **rest of the HMA** outside the main settlements, most of which has detailed or outline planning permission. By contrast, **Marlborough** registered no land with consent or allocated in a plan. **Royal Wootton Bassett** has land allocated but more land would need to be planned for if the current strategy was rolled forward.
72. The proportion of land already in the pipeline to what would be needed to meet the current strategy is shown below.

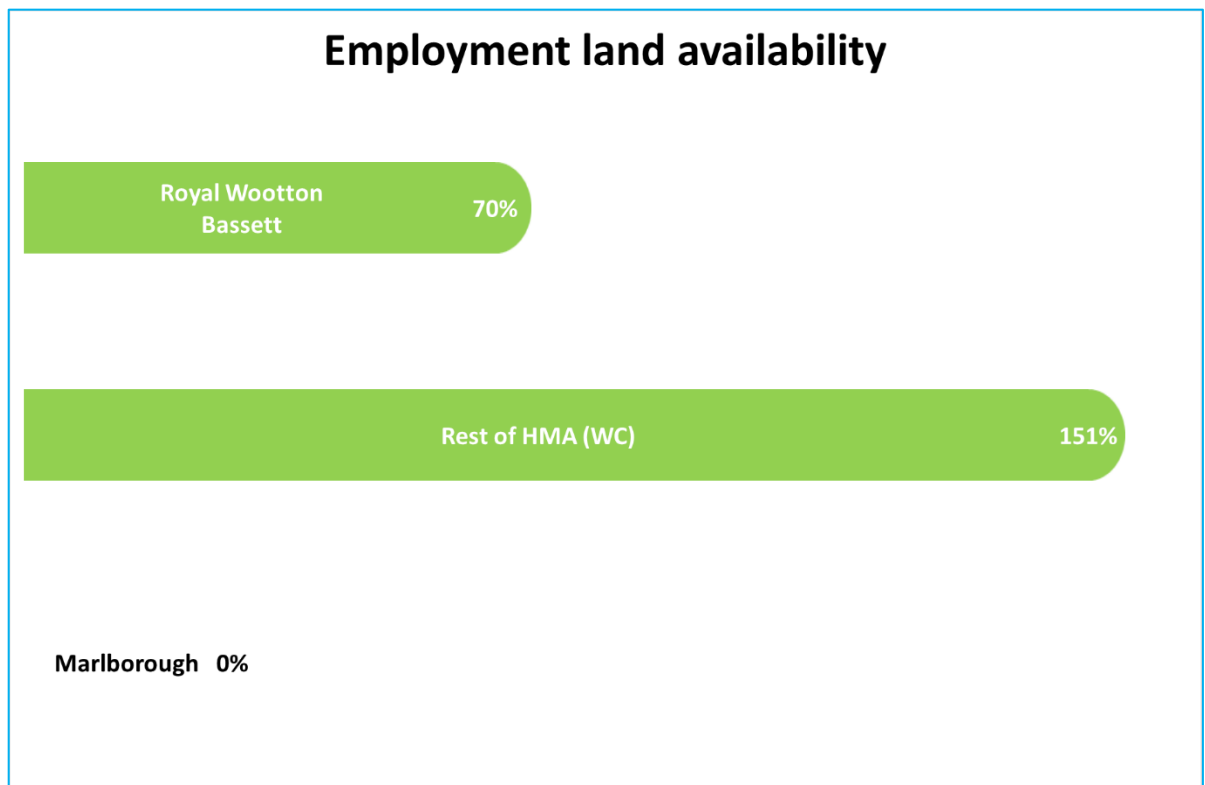


Figure 5 Employment land availability (2018)

73. No land has been promoted solely for employment development. Overall the total HMA requirement for rolling forward the current strategy could be met through allocations and outstanding permissions. However, the bulk of employment land would be coming forward in the HMA remainder which is unsurprising given its strong past performance. In turn, the settlements of Royal Wootton Bassett and especially Marlborough would not be able to meet their requirements when rolling forward the current strategy.

## Conclusion

74. Employment land is coming forward in the remainder of the HMA whereas delivery at the HMA's market towns is poor.



## Economic Aspects

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

75. The ELR produced different scenarios for the demand for employment land over the plan period<sup>8</sup>. 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

76. **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.
77. 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.
78. The comparisons show very much stronger economic performance in the **rest of the HMA**. The evidence supports higher scales of growth in the rest of the HMA.
79. Housing growth at Marlborough and **Royal Wootton Bassett** would be less as a result of the greater focus elsewhere in the HMA, with a more marked reduction at **Marlborough**, suggesting lower rates of growth.
80. The **West of Swindon** has not been treated as a location for employment land allocation or forecasts separate to Swindon. It is not therefore possible to make a comparison and no change either higher or lower can be implied. This location would meet Swindon's needs for employment development and its suitability considered should there be unmet needs within the Borough.

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<sup>8</sup> Employment Land Review, Appendix 5 page 14, Hardisty Jones Associates, (2018)

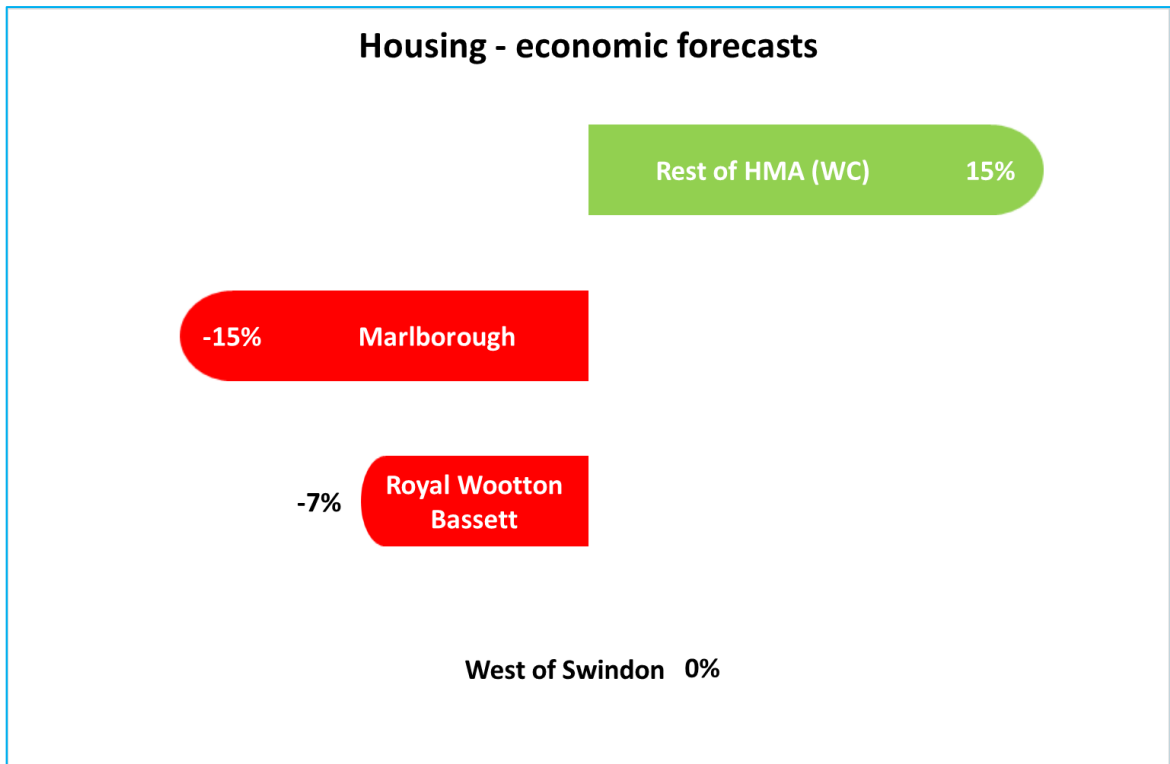


Figure 6 Housing - economic forecasts

## Employment

81. The Employment Land Review broadly support the findings of the previous analysis. Relatively higher growth is forecast for the **rest of the HMA**, whereas for **Marlborough** and **Royal Wootton Bassett** growth is generally below the levels of the current strategy when rolled forward. Levels of growth forecast to be lower than under the current strategy would not necessarily result in no new employment land however. What lower growth does indicate is that the current level of growth cannot be sustained but may still require some additional employment land up to 2036. This is supported by the ELR finding that there is currently a shortage of employment land in the M4/Swindon FEMA (excluding Swindon), albeit small (4 ha in the first five years).

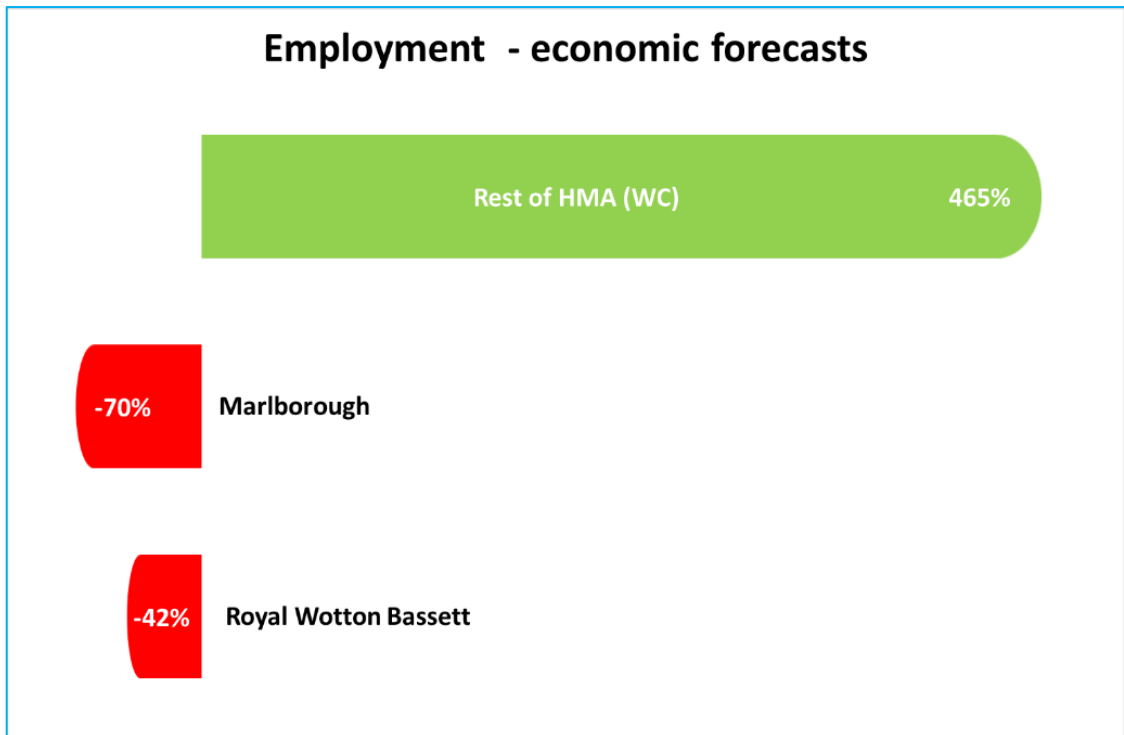


Figure 7 Employment - economic forecasts under ELR market-led scenario

82. With this in mind, the Employment Land Review highlights the shortage of employment land at **Marlborough** and the existing business park is fully occupied. The lack of suitable land could be the reason for poor past performance of the town and indicates that additional land may be required. While the ELR recommends additional allocations at Marlborough the forecast is lower than rolling forward the current strategy.
83. The ELR notes the relatively small employment base at **Royal Wootton Bassett** and that employment growth has largely stagnated since 2009. It does nonetheless forecast employment land demand but this is lower than under the current strategy rolled forward.

## Conclusion

84. Economic forecasts all suggest a higher share of both housing and employment growth being apportioned to **the rest of the HMA** and less to the main settlements of **Marlborough and Royal Wootton Bassett**. Some additional employment land will be required at the market towns however to address local shortfall in supply.

## Social Aspects

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

85. **Population** - This analysis compares the population distribution of the HMA to the distribution of housing if the current strategy was rolled forward.
86. 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.

87. **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.
88. **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.

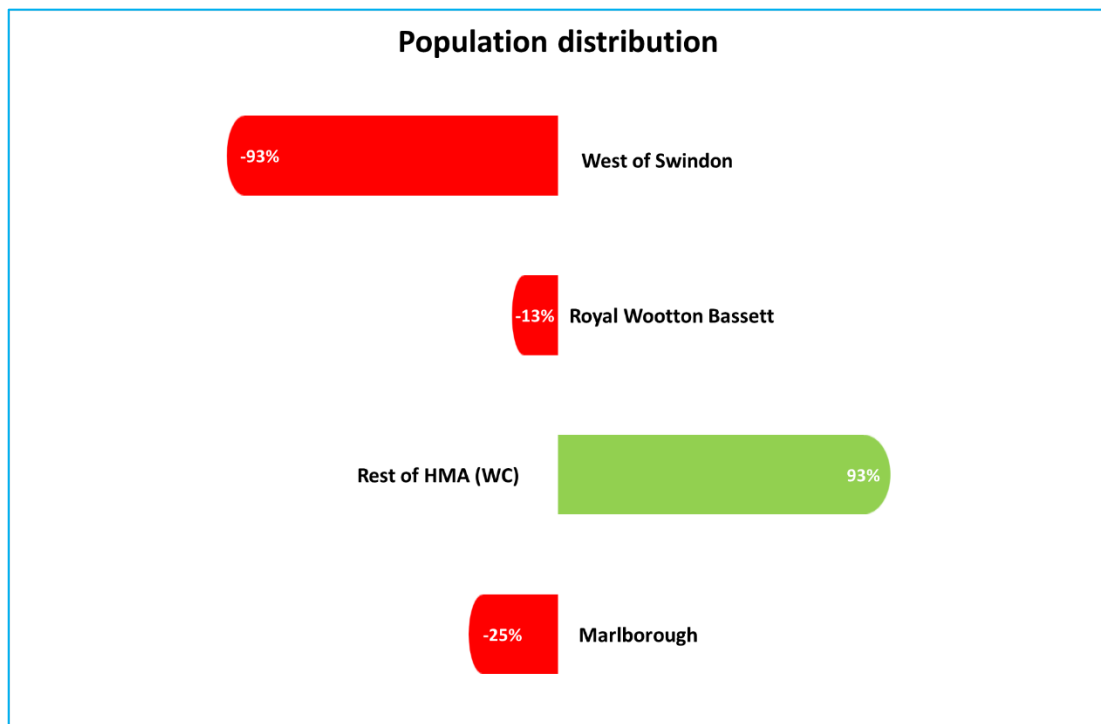


Figure 8 Housing population distribution (est 2016)

89. Elsewhere scales are less because of the large proportion of the population living outside those main settlements. They are, however significantly less at **West of Swindon**. In some respects this is artificial as it reflects the fact that it is not a separate settlement with an existing population base, unlike **Marlborough** and **Royal Wootton Bassett**. Nevertheless, on the basis that most housing needs will arise where there are the most people, it does imply lower rather than higher growth.

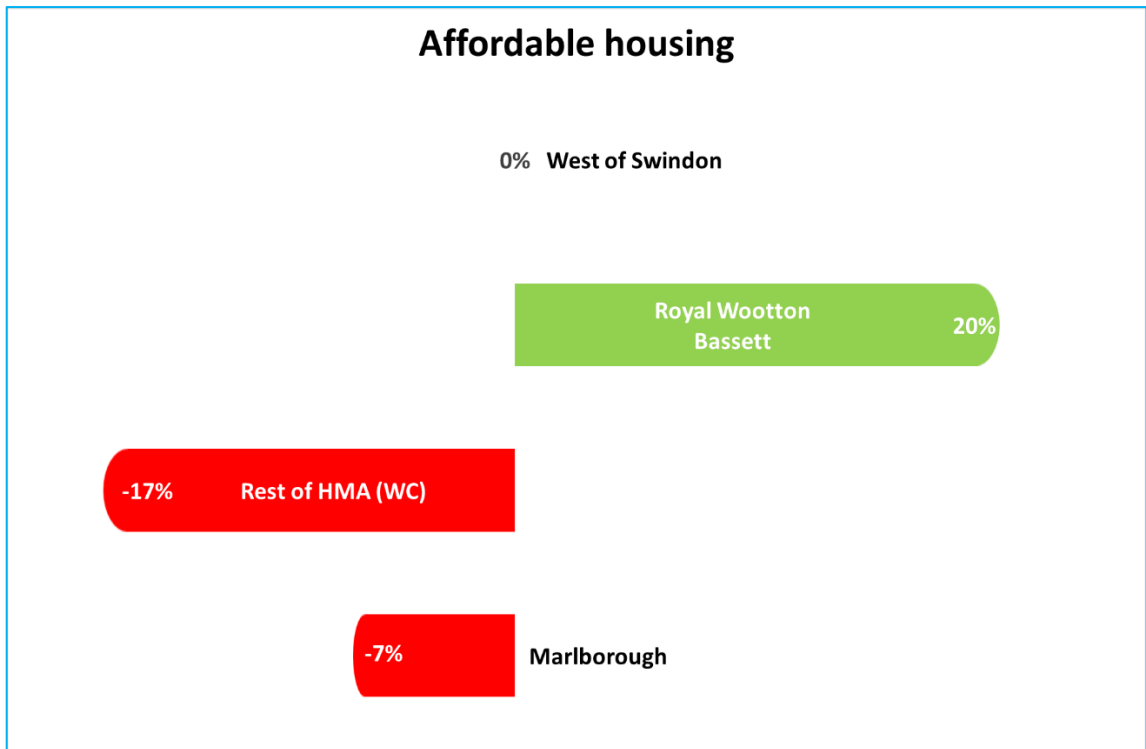


Figure 9 Housing - affordable housing (Sept 2017)

90. **Affordable housing** - The pattern of needs for affordable housing has been measured by a snapshot of preferences<sup>9</sup> listed on the Council's housing register. **West of Swindon** is not available as a preference and cannot therefore be used in the comparison.
91. This evidence suggests more homes for **Royal Wootton Bassett**. This is despite the town receiving a higher rate of housing growth than that anticipated in the WCS.
92. There appears, however, no marked evidence for higher growth in either the Rest of the HMA or Marlborough for higher rates of growth justified by the need to meet needs for affordable housing.

## Conclusion

93. Assessments suggest a higher share of growth for the **rest of the HMA** and for **Royal Wootton Bassett** and lower for **West of Swindon** and, to lesser degree, for **Marlborough**.

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<sup>9</sup> Preferences on the register at September 2017

## Development of Alternative Development Strategies

94. The information collated in relation to the 'place based assessment' and 'potential scales of growth' use a baseline of rolling forward the current strategy. The results are summarised in the table and an informed planning judgement is therefore made what alternatives to test.

	Place based assessment							Assessment of Potential scales of growth					
	Environmental aspects				Infrastructure			Deliverability		Economic aspects		Social aspects	
	Biodiversity	Landscape	Heritage	Flooding	Education	Transport	Consultation	Trends	Land availability	Housing	Employment	Population	Affordability
Marlborough	Yellow	Yellow	Yellow	Red	Green	Green	Red	Green	Green	Red	Red	Red	Red
Rest of HMA (Wiltshire only)	White	White	White	White	White	Yellow	Green	Green	Green	Green	Green	Green	Red
Royal Wootton Bassett	Green	Green	Green	Yellow	Red	Green	Yellow	Green	Red	Red	Red	Red	Green
West of Swindon	Yellow	Yellow	Green	Green	Green	Green	Yellow	Green	Yellow	Red	White	Red	White

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

Table 10 Summary of results

95. 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:

<b>Locations</b>	<b>Summary conclusion</b>	<b>Higher or Lower than rolling forward the current strategy</b>
<b>Marlborough</b>	Public consultation showed concern at the prospects of further growth in so doing reflecting on several concerns, such as air quality, traffic and the adequacy of local infrastructure. The ELR and consultation responses support some additional employment at the town but this would be lower compared to rolling forward the current strategy. Land supply and developer interest, though strong, is not so robust as clearly capable of much higher rates of growth. Assessment of social and economic aspects tended to suggest lower rather than higher rates of growth.	Lower
<b>Royal Wotton Bassett</b>	Public consultation recognised the dormitory role of the town to Swindon but a theme saw that this relationship could be improved by investment in transport infrastructure. Secondary school capacity is also a possible constraint. There is also a significant supply of land and housing delivery exceeds indicative scales envisaged in the WCS One course to consider is for investment to be supported by higher growth. The ELR and consultation responses support some additional employment at the town but this would be lower compared to rolling forward the current strategy. Economic forecasts however indicate a smaller share of housing growth, but there was a marked need for affordable homes,	Higher

	<p>although a strong recent track record of housing delivery does not so far appear to have been successful in reducing such a need. On balance, rolling forward the current strategy involves a lower assessment of overall need, it would also be appropriate to examine the opportunities for a higher rate of growth.</p> <p>There are heritage and landscape risks. It would instead be sensible to test a period of consolidation that plans for a lower rate of growth. Again, however, scope is limited by the scale of land already in the pipeline.</p> <p>The evidence points to testing a lower growth alternative. However in order to investigate the possibility to address infrastructure constraints a higher growth alternative should be tested also.</p>	
<b>Rest of HMA</b>	<p>Public consultation pointed to Lyneham and Cricklade as having more strategic role than meeting local needs. Economic forecasts as well as population and housing needs assessments suggest a higher share of HMA growth including employment land provision. There is also a significant supply of land and housing delivery exceeds indicative scales envisaged in the WCS. It would be appropriate to test a higher rate of growth. although, as elsewhere, scope to do so may be restricted by the current level of housing commitments..</p>	Higher
<b>West of Swindon</b>	<p>Perhaps more than other locations, rates of further growth West of Swindon need to be considered in the context of the Borough's needs as a whole, and specifically whether all the Borough's needs can be met within its boundary. Public consultation suggests, amongst other things, that the area would need to fulfil a role by supplementing the range of site size to help improve housing delivery in the Borough. In isolation there do not appear</p>	Lower



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to be justifications for higher rates of growth. Rolling forward the current strategy presumes there will be unmet needs from Swindon Borough rather than needs from within Wiltshire. This has not been established. At this stage there is a justification for lower rates of growth

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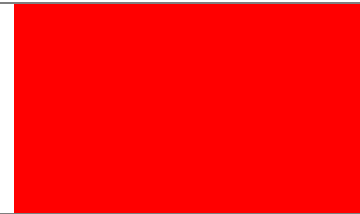


Table 11 Summary conclusions

## Alternative Development Strategies

Using these reasons and assumptions the following alternatives allow testing of a range of choices about the future of the area.

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.

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

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#### Method

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Housing and employment land requirements are reduced by 16% and distributed pro-rata rolling forward the current strategy.

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#### Justification

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

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#### Risks

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The approach duplicates the current WCS distribution without reviewing its effectiveness; for example this ignores that the remainder of the HMA compensates for poor employment growth at the market towns.

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Settlement Area	Housing		Employment
	Requirement	Residual	Additional requirement
	Dwellings		Hectares
<b>Marlborough</b>	570	135	4
<b>Royal Wootton Bassett</b>	900	670	2
<b>West of Swindon</b>	755	271	-
<b>Rest of HMA</b>	1030	358	-
<b>Total</b>	3255	1434	6

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## SW-B Focus on Royal Wotton Bassett

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### Method

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Housing development is constrained at Marlborough to current commitments (plus windfall allowance and growth in rest of HMA reflects assessed need (-16%). No further development beyond existing commitments west of Swindon.

The balance is focussed on Royal Wootton Bassett (from about 900 homes in SW-A to about 1,300 homes).

New employment land proposed only at Royal Wootton Bassett.

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### Justification

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Housing growth at Royal Wootton Bassett has exceeded rates indicated in the WCS. The suggested level represents a slackening of the rate of development 2006-2016. Further development will require significant infrastructure such as a secondary education capacity. On a sufficient scale it might also support transport investment that provides wider benefits, including more sustainable links to Swindon. Employment land allocations would seek to balance the proposed increase in housing growth.

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### Risk

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The level of growth suggested for Royal Wootton Bassett would require significant greenfield land release that may not be capable of being accommodated without unacceptable environmental costs. The scale of growth implies large and complex site(s) that may be time consuming to deliver. The scale may not achieve the infrastructure intended.

No additional provision for development west of Swindon may lead to further speculative pressures.

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Settlement Area	Housing		Employment
	Requirement	Residual	Additional requirement
	Dwellings		Hectares
Marlborough	485	50	-
Royal Wootton Bassett	1255	1026	6
West of Swindon	485	0	0
Rest of HMA	1030	358	-
<b>Total</b>	<b>3255</b>	<b>1434</b>	<b>6</b>

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## SW-C Focus on the Rest of the HMA

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### Method

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Growth in Marlborough and the rest of the HMA continue Core Strategy rates of housing growth. Development is reduced at Royal Wootton Bassett. No further development beyond existing commitments west of Swindon.

New employment land only proposed at Marlborough and rest of the HMA.

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### Justification

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WCS indicative requirements have been exceeded. There is a high level of current housing commitments. A higher rate of development allows more scope to consider more strategic roles for larger rural settlements such as Cricklade and Lyneham.

Employment land requirements match market expectations and the increase in growth in the remainder of the HMA.

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### Risk

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Scope to support higher rates of growth with the necessary infrastructure are uncertain over a wider area. The pattern of growth may have more environmental effects in terms of loss of countryside and create higher than necessary levels of car-based commuting. No additional provision for development west of Swindon may lead to further speculative pressures.

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Settlement Area	Housing	Residual	Employment
	Requirement		Additional requirement
	Dwellings		Hectares
<b>Marlborough</b>	680	245	3
<b>Royal Wootton Bassett</b>	835	606	-
<b>West of Swindon</b>	485	0	-
<b>Rest of HMA</b>	1255	583	3
<b>Total</b>	3255	1434	6

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## 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.

<b>Potential impacts</b> <i>Place based assessment</i>	<b>Development trends</b> <i>Assessment of different scales of growth</i>
<p><b>Biodiversity:</b> what is the risk of harming local biodiversity?</p> <p>(Source: advice from specialists based on published information)</p>	<p><b>Trends:</b> 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><b>Landscape:</b> 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><b>Land availability:</b> 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><b>Heritage:</b> what is the risk of harming heritage assets?</p> <p>(Source: advice from specialists based on published information)</p>	<p><b>Economy:</b> 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><b>Flooding:</b> what is the likelihood of unacceptable risks of flooding?</p> <p>(Source: advice from specialists based on published information)</p>	<p><b>Social:</b> 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><b>Infrastructure:</b> 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.