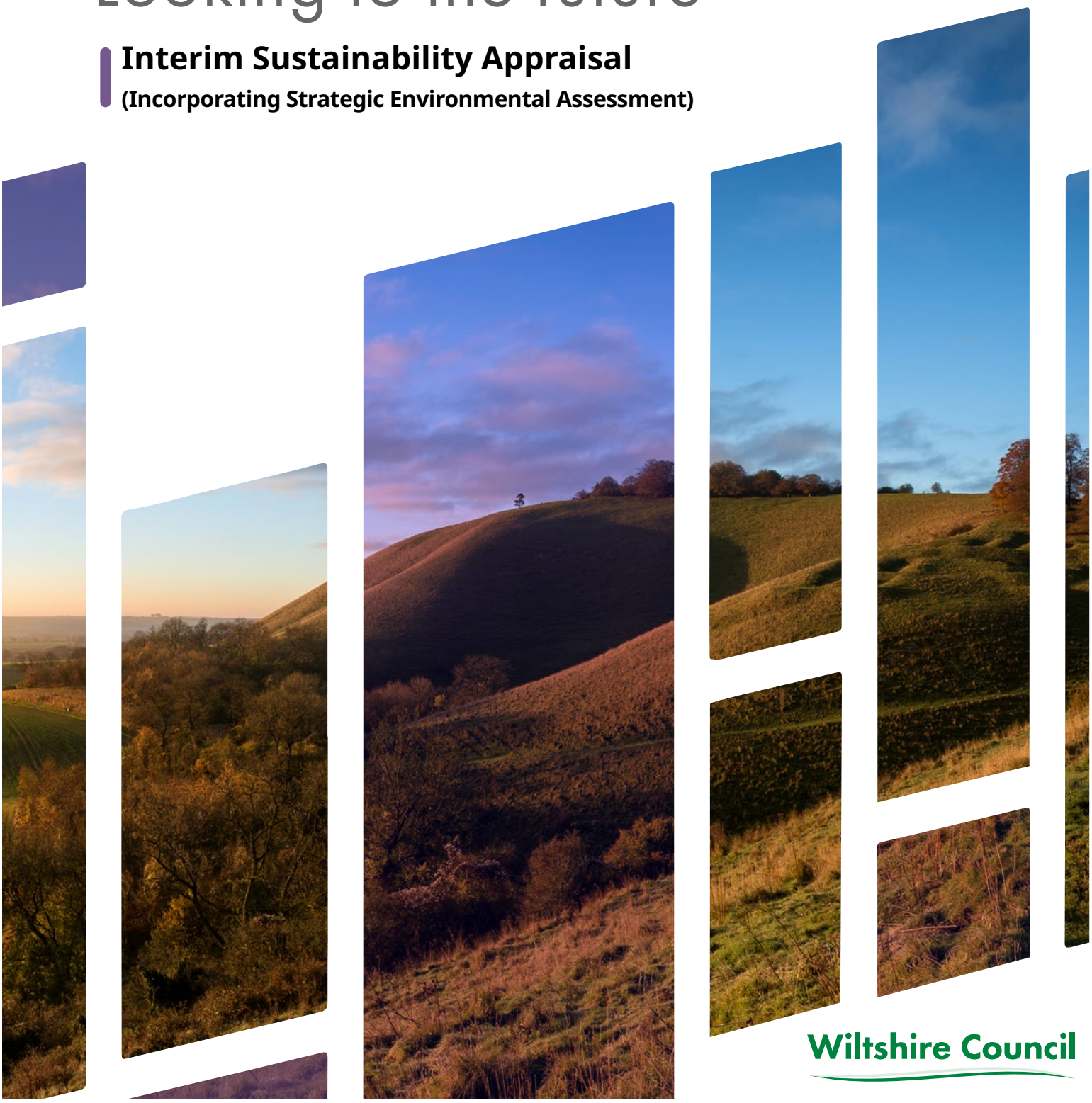
January 2021

Wiltshire Council
LOCAL PLAN
Looking to the future

Interim Sustainability Appraisal
(Incorporating Strategic Environmental Assessment)



Wiltshire Council

Table of contents

Non-Technical Summary (separate document)

1. Introduction

1.1 Introduction and structure of this report

1.1.1 This report is the Interim Sustainability Appraisal (SA) Report of the draft Wiltshire Local Plan Review (the 'draft Plan'). It is published alongside the draft Plan for informal consultation at this stage of plan preparation.

1.1.2 The Planning and Compulsory Purchase Act 2004[1] requires a local planning authority to carry out a sustainability appraisal during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

1.1.3 Wiltshire Council is reviewing the Wiltshire Core Strategy, adopted in January 2015, which identifies land for development for the period to 2026. The review aims to maintain an up-to-date plan to support growth so there is enough land for homes, jobs and the infrastructure necessary to support them, up to 2036.

1.1.4 This Interim SA Report is an informal document that presents the results of the SA process so far, as the Plan has developed. It reports on how the SA has informed the development of the Plan. A formal SA Report will accompany a pre-submission version of the Plan at Reg 19 consultation.

1.1.5 This chapter sets out:

- The context to the Wiltshire Local Plan Review
- The requirements for SA and Strategic Environmental Assessment (SEA)
- Compliance with the requirements of the SEA Regulations
- Consultation in the SA process

1.1.6 Following this introduction chapter, the interim report then contains the following chapters:

- Sustainability Appraisal Methodology (Chapter 2)
- Sustainability Appraisal Scoping summary (Chapter 3)
- Assessment of Alternative Development Strategies (Chapter 4)
- Assessment of potential development sites at Principal Settlements (Chapter 5)
- Conclusions and next steps (Chapter 6)

1.1.7 The SA Framework, which forms the basis for all assessments in this interim report, is presented in Appendix A. Detailed assessment matrices are in Annexes I and II.

1.2 Wiltshire Local Plan Review

What is the Local Plan Review?

1.2.1 The Local Plan determines where and how development takes place. It is a key component of Wiltshire's development plan and helps guide decision making and the content of all neighbourhood plans. All planning applications by law are determined in accordance with the development plan unless material considerations indicate otherwise. It is a legally required document containing planning policies and site allocations to deliver the Council's strategic priorities.

1.2.2 The current Local Plan is the Wiltshire Core Strategy. The Government requires every Local Plan to be reviewed at least once every five years. The Core Strategy was adopted in 2015 and is therefore being reviewed.

[1] Planning and Compulsory Purchase Act 2004 19 (5) (a) (b)

What changes are being made to the Local Plan?

1.2.3 The Core Strategy has a plan period of 2006 to 2026. The Local Plan Review will update this and cover the period 2016 to 2036. It must plan positively to meet forecast development needs over this extended time horizon. Most notably it must plan to meet assessed housing needs.

1.2.4 The Council has forecast scales of need and looked at different ways it can be accommodated by alternative distributions of growth. These alternatives have now been tested, including through this sustainability appraisal. Based on these results, an emerging strategy sets a scale of growth for each settlement in the County expressed as additional homes and land for employment development over the period 2016-2036. This emerging strategy has also been assessed through this sustainability appraisal.

Informal consultation on the Local Plan

1.2.5 Consultation is intended to be informal and is at an early stage of Plan production, before a draft Plan is formulated, informed by views on:

- a scale of growth for each main settlement;
- what place shaping priorities growth might address; and
- where development might take place.

1.2.6 Consultation is based around a 'settlement statement' for each Principal Settlement[2] and Market Town[3] with the aim of stimulating a community conversation about each place, and a 'Site Selection Report' for each Principal Settlement and Market Town which summarises the technical work for where development might take place. In support of this, one 'Emerging Strategy' paper explains how a scale of growth was arrived at.

1.2.7 The current strategy focuses the bulk of growth at the Principal Settlements. Preferred sites are suggested for where development may take place at these settlements, informed by this sustainability appraisal. At Market Towns, preferred sites are not selected. Preferred sites at Market Towns will be included in a future draft Plan, informed by input from the local community and further, more detailed assessment, including sustainability appraisal.

1.2.8 A scale of growth is also suggested for designated rural settlements, as required by Government, and views are invited on changes to planning policies for rural areas aimed at bolstering how local communities might meet local needs. This is contained in a separate paper entitled 'Empowering Rural Communities'.

1.3 Sustainability Appraisal and Strategic Environmental Assessment requirements

1.3.1 Sustainability Appraisal (SA) is required during the preparation of a Local Plan, under the regulations implementing the provisions of the Planning and Compulsory Purchase Act 2004. SA promotes sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. It applies to any of the documents that can form part of a Local Plan, including core strategies, site allocation documents and area action plans.

1.3.2 This Interim SA incorporates Strategic Environmental Assessment (SEA) in line with the EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment

[2] Chippenham, Salisbury and Trowbridge
[3] Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton Bassett, Tidworth/Ludgershall, Warminster, Westbury

(the 'SEA Directive'). The Directive came into force in the UK in 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations').

1.3.3 The overarching objective of the SEA Directive is:

> *"To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans… with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans… which are likely to have significant effects on the environment." (Article 1).*

1.3.4 The Directive applies to a variety of plans and programmes including those for town and country planning and land use. It applies in this case to the Wiltshire Local Plan Review.

1.3.5 SA (incorporating SEA) is an iterative assessment process which plans and programmes are required to undergo from an early stage as they are being developed, to ensure that potential significant effects arising from the plan/programme are identified, assessed, mitigated and communicated to plan-makers. It also requires the monitoring of significant effects once the plan/programme is implemented.

1.3.6 The main stages in the SA process are shown in Figure 1.1. These stages are:

- Stage A – Setting the context and objectives, establishing the baseline and deciding on the scope
- Stage B – Developing and refining alternatives and assessing effects
- Stage C – Preparing the SA Report
- Stage D – Consultation on the Reg 19 Plan and the SA Report
- Stage E – Publishing post-adoption statement and monitoring the significant effects of implementing the Plan

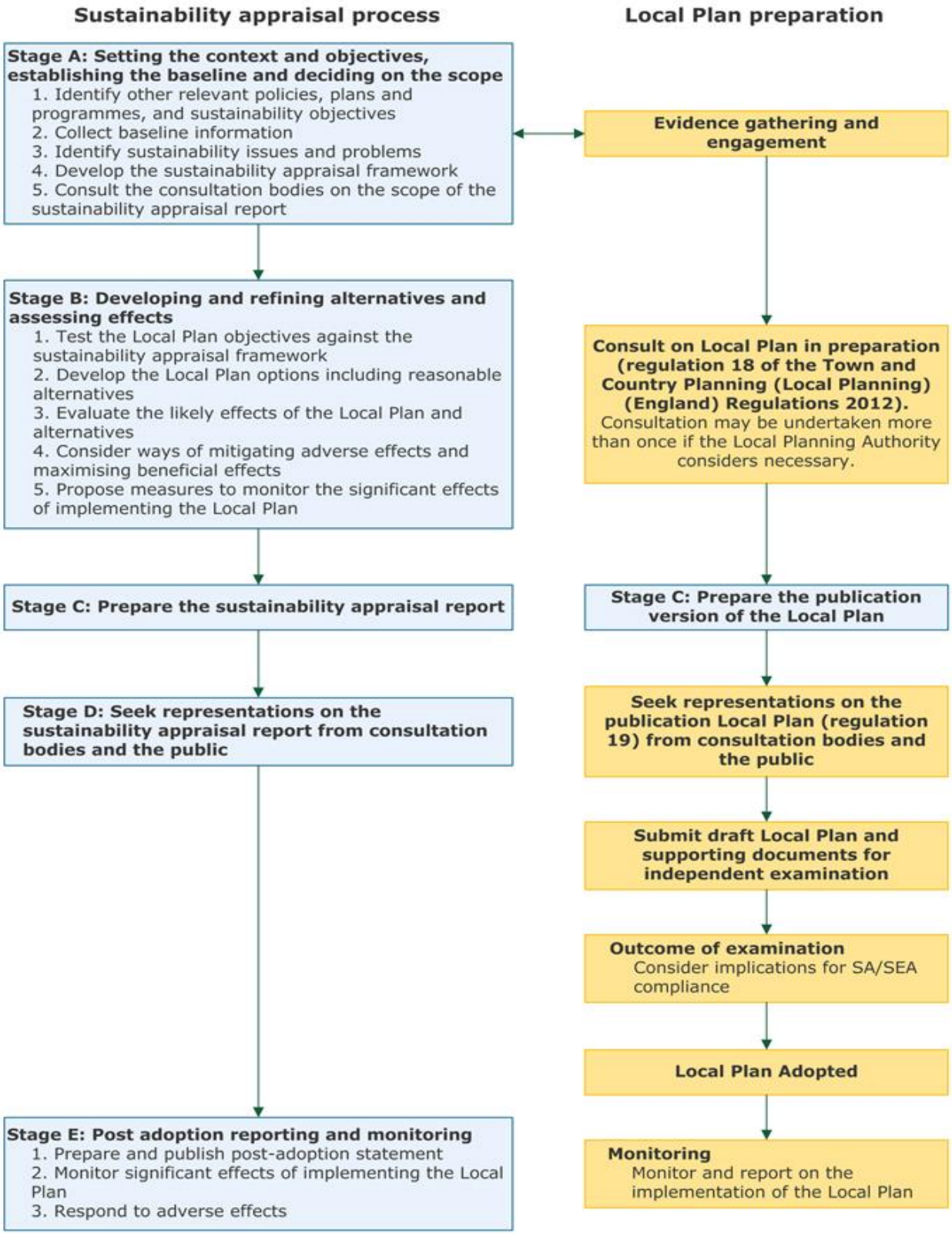


Figure 1.1 The SA process in relation to Plan-Making

Source: Reproduced from PPG Paragraph 013 Ref ID: 11-013-20140306
https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#sustainability-appraisal-requirements-for-local-plans-and-spatial-development-strategies

1.4 Compliance with the requirements of the SEA Regulations

1.4.1 This Interim SA Report is an informal document at this stage of the Plan's preparation. However, it complies with the requirements of the SEA Regulations as shown in Table 1.1. A description of measures envisaged concerning monitoring will be set out in the formal SA Report at Reg 19 pre-submission consultation.

Table 1.1: Requirements of the SEA Regulations

Requirement	Where covered in Interim SA Report
1) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	SA Report Section 1.2 and SA Scoping Report Chapter 3 and Appendix A
2) The relevant aspects of the current state of the environment and the likely evolution without implementation of the plan or programme	SA Report Section 3.4 and SA Scoping Report Chapter 4 and Appendix B
3) The environmental characteristics of areas likely to be significantly affected	SA Report Section 3.4 and SA Scoping Report Chapter 4 and Appendix B
4) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC and 92/43/EEC	SA Report Section 3.5 and SA Scoping Report Chapters 4, 5 and Appendix B
5) The environmental protection objectives established at international, community or national level which are relevant to the programme and the way those objectives and any environmental considerations have been taken into account during its preparation	SA Report Section 3.3 and SA Scoping Report Chapter 3 and Appendix A
6) The likely significant effects on the environment, including short, medium and long term; permanent and temporary; positive and negative; secondary, cumulative and synergistic effects on issues such as: Biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage; landscape and the interrelationship between the above factors.	SA Report Chapters 4 and 5 and Annexes I and II
7) The measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme.	SA Report Chapters 4 and 5 and Annexes I and II
8) An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	SA Report Chapters 2, 4 and 5
9) A description of measures envisaged concerning monitoring (in accordance with Regulation 17)	This will be set out in the SA Report at Reg 19 consultation stage
10) A non-technical summary of the information provided under the above headings	Non-Technical Summary (separate document)

1.5 Consultation in the Sustainability Appraisal process

1.5.1 The requirements for consultation on the SA Report are set out in the SEA Regulations[4]. These are:

- Reg 12 (5) – *'when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'*
- Reg 13 (1) – *'every draft plan…for which an environmental report has been prepared…and its accompanying environmental report…shall be made available for the purposes of consultation'*
- Reg 13 (2) (a) and (b) – *'send a copy of those documents to each consultation body; take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan…'*

[4] The Environmental Assessment of Plans and Programmes Regulations 2004

1.5.2 The SA Scoping Report for the Local Plan Review (LPR) has undergone consultation on two separate occasions, as follows:

- Alongside consultation on a Local Plan Consultation Paper and Joint Spatial Framework – 7th November 2017 to 19th December 2017
- Consultation on a revised SA Scoping Report – 22nd May 2020 to 3rd July 2020 with the 'consultation bodies' (Natural England, Historic England, Environment Agency)

1.5.3. This Interim SA Report is being consulted on from 13th January 2021 to 9th March 2021 as part of the consultation on the Wiltshire LPR. A formal SA Report of the draft Plan at Reg 19 stage will be consulted on, scheduled for quarter 4 2021.

2. Sustainability Appraisal Methodology

2.1 Introduction

2.1.1 This chapter sets out the methodology adopted for the SA which is in line with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG), SEA Regulations and government guidance on the Strategic Environmental Assessment (SEA) Directive[5].

2.1.2 Figure 1.1 shows the SA process in relation to plan-making. It identifies several SA stages. Stage A has been completed and is summarised in Chapter 3. This Interim SA Report covers part of Stage B as the consultation on the draft Plan is only considering the housing requirement and its distribution across Wiltshire and potential development sites at the Principal Settlements. The Reg 19 consultation will include a formal SA Report covering SA Stages A-D.

2.2 Stage A – Scoping

2.2.1 The SA Scoping Report was published in February 2019[6] and a revised report published in September 2020[7], both after undergoing periods of consultation. Chapter 3 of this report summarises the scoping outcomes.

2.2.2 The SA Scoping Report reports on a number of tasks as shown in Stage A of Figure 1.1. For further information, refer to the individual reports.

2.3 Stage B - Developing and refining alternatives and assessing likely effects

2.3.1 The SA considers and compares the likely effects of reasonable alternatives - the different realistic options considered by the plan-maker in developing the policies in the plan - as the plan evolves, and assesses these against the baseline environmental, economic and social characteristics of the area.

2.3.2 Essentially, this stage involves using information obtained from the scoping stage and further detailed evidence, to predict and evaluate the nature and significance of likely effects arising from the proposals so far, and to identify potential improvements and mitigation solutions.

2.3.3 Likely significant effects on environmental, economic and social factors, using the SA objectives outlined in the SA Framework (see section 3.6 and Appendix A), are identified, described and evaluated (employing the same level of detail for each alternative option).

2.3.4 Criteria for determining the likely significance of effects on the environment are set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004[8]; this uses the following parameters to determine significance:

- Nature and magnitude of effect – i.e. positive or negative
- Scale – i.e. local, regional, national
- Permanence – i.e. permanent or temporary
- Certainty
- Duration – i.e. short, medium and long term
- Sensitivity of receptor
- Secondary, cumulative and synergistic effects

2.3.5 Evaluation involves forming a judgement on whether the predicted effects are likely to be significant. The principal technique used to assess the significance of effects is a qualitative assessment based on expert judgement and supported by specific evidence. Significance is based on a seven-point

[5] A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, September 2005)
[6] Wiltshire Local Plan Sustainability Appraisal Scoping Report (Wiltshire Council, February 2019)
[7] Wiltshire Local Plan Sustainability Appraisal Scoping Report (Wiltshire Council, September 2020)
[8] https://www.legislation.gov.uk/uksi/2004/1633/regulation/16/made

scale shown in Table 2.1, where effects that are 'major' or 'moderate' are considered to be significant whereas minor and neutral effects are not.

Table 2.1: Assessment scale for evaluating significance of likely effects

Assessment Scale	Assessment Category	Significance of Effect	Description of likely effect
+ + + (+3 points)	Major positive	**Significant**	Option likely to have a **major positive** effect on the objective as it would help maximise opportunities
+ + (+2 points)	Moderate positive		Option likely to have a **moderate positive** effect on the objective as it would help resolve an existing issue
+ (+1 point)	Minor positive	Not Significant	Option likely to have a **minor positive** effect on the objective as enhancement of existing conditions may result
0 points	Neutral effect		On balance option likely to have a neutral effect on the objective or no effect on the objective
- (-1 point)	Minor adverse		Option likely to have a **minor adverse** effect on the objective. Mitigation measures are readily achievable
- - (-2 points)	Moderate adverse	**Significant**	Option likely to have a **moderate adverse** effect on the objective. Mitigation likely to be difficult or problematic
- - - (-3 points)	Major adverse		Option likely to have a **major adverse** effect on the objective with no satisfactory mitigation possible

SA Stage B - Assessment of Alternative Development Strategies

2.3.6 Chapter 4 explains that Wiltshire Council's Cabinet approved the testing of a range of employment and housing growth for Wiltshire over the period 2016 to 2036, to include Alternative Development Strategies (ADS) for different distributions of employment and housing growth by Housing Market Area (HMA), in order to develop a preferred development strategy.

2.3.7 The Standard Method[9] is the starting point for plan-making and represents the minimum number of homes needed in the local authority area. However, considering other factors, a local housing need figure higher than the Standard Method may also be appropriate. Wiltshire Council and Swindon Borough Council commissioned a Local Housing Needs Assessment[10] (LHNA) in 2019 which suggests that a figure for local housing needs could take into consideration longer term migration trends and anticipated growth in number of jobs.

2.3.8 Evidence suggests at this stage that the SA should assess a range of local housing needs from 40,840 to 45,600 homes for the period 2016 to 2036. The SA has therefore assessed the likely effects of delivering both higher and lower housing needs figures as 'reasonable alternatives' through various distribution options within the four HMAs. The basis for this assessment is the SA Framework in Appendix A.

2.3.9 In terms of employment land, the Swindon and Wiltshire Functional Economic Market Area Assessment[11] (FEMAA) supported by the Wiltshire Employment Land Review (ELR) 2017[12] forms the basis for disaggregating the need for employment land in the county and the basis for the SA assessment.

2.3.10 The starting point for disaggregating housing and employment needs to the HMA level was a straightforward proportionate roll forward of the Wiltshire Core Strategy distribution. This has then been used as a basis for identifying reasonable ADS to be further assessed through the SA. The methodology and possible distributions to each HMA and the Principal Settlements, Market Towns

[9] As per NPPF paragraph 60
[10] Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019 – Report of Findings (ORS, April 2019)
[11] Swindon and Wiltshire Functional Economic Market Area Assessment (Hardisty Jones Associates, December 2016)
[12] Wiltshire Employment Land Review (Hardisty Jones Associates, May 2018)

and Rest of HMA (rural areas) were set out in Cabinet 30th April 2019 papers[13], and subsequently approved by Cabinet.

2.3.11 The alternative strategies for each of the four HMAs are presented in paragraph 4.1.8. Each strategy was assessed against the 11 SA objectives (and associated decision-aiding questions), contained in the SA Framework at the time this assessment was done i.e. prior to the SA Scoping Report being revised in May 2020. The focus was on the environmental, economic and social impacts that are likely to be significant for each strategy, and possible mitigation measures that could reduce or improve these impacts.

2.3.12 For each SA objective, the assessment was undertaken on each settlement, as well as the rural area, called 'Rest of the HMA', for each strategy, with an average score calculated[14]. A higher requirement (based on the LHNA, FEMAA and ELR), lower requirement (based on the 'Standard Method', FEMAA and ELR) and an Emerging Preferred Strategy were assessed. Summaries of each assessment for the four HMAs are presented in sections 4.2 to 4.5 with the detailed matrices in Annex I. The summaries show the average scores for each strategy against each SA objective. An overall score is then provided for each strategy, based on the following points system:

Major positive effect (+++)	+3 points
Moderate positive effect (++)	+2 points
Minor positive effect (+)	+1 point
Neutral effect (0)	0 points
Minor adverse effect (-)	-1 point
Moderate adverse effect (--)	-2 points
Major adverse effect (---)	-3 points

SA Stage B - Assessment of potential development sites at Principal Settlements

2.3.13 A site selection process has been undertaken by the Council to select the potential 'reasonable alternative' sites at the Principal Settlements for further assessment through the SA. A summary of the site selection process is shown in Figure 2.1:

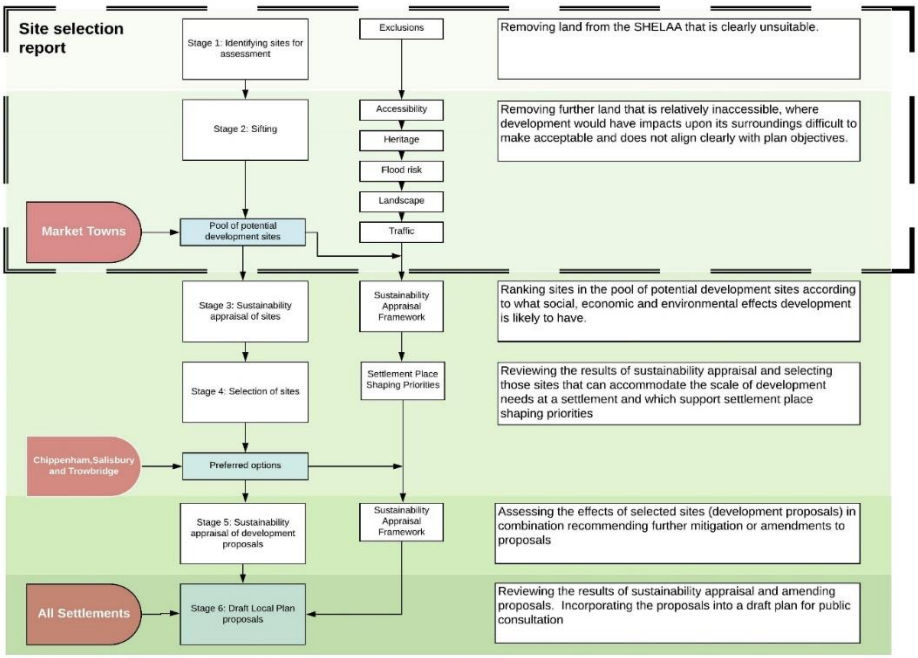


Figure 2.1: Local Plan Review Site Selection Process

[13] Appendix 4 – Chippenham Housing Market Area Assessment Summary; Appendix 5 - Salisbury Housing Market Area Assessment Summary; Appendix 6 - Swindon Housing Market Area Assessment Summary; Appendix 7 - Trowbridge Housing Market Area Assessment Summary.

[14] Average scores are rounded up or down to nearest significance category e.g. -1.4 is rounded down to -1, -1.6 is rounded up to -2, -1.5 is rounded up to -2.

2.3.14 This SA stage is shown as Stage 3 in Figure 2.1. The findings of Stages 1 and 2 for the Principal Settlements are documented in separate site selection papers for those settlements.

2.3.15 Stage 1 of the Council's site selection process identifies unsuitable land using a set of unambiguous exclusion criteria. These are as follows:

	Strategic exclusionary criteria
1	Is the land already allocated/identified for development?
2	Does the land have planning permission for built development or has it been recently completed?
3	Is the land detached from the settlement (not adjoining the settlement boundary or a site(s) that does)?
4	Is the land fully or partly within the settlement boundary?
5	Is the land fully or partly within one or more specific environmental designations of biodiversity or geological value?
6	Is the land fully or partly within green belt?
7	Is the land within flood risk areas, zones 2 or 3?
8	Is the land fully or partly within areas involving internationally or nationally designated heritage assets?

2.3.16 Stage 2 of the site selection process sifts out sites based on: (a) accessibility and wider impacts of a site which include landscape, heritage, flood risk and traffic; and (b) the strategic context of the settlement the site is in, including long-term patterns of development, significant environmental factors, scale of growth and strategic priorities and future growth possibilities for the urban area.

2.3.17 The potential development sites at the Principal Settlements that were not excluded through Stages 1 and 2 were then assessed against the 12 SA objectives in the SA Framework[15] (see section 3.6 and Appendix A) and the findings reported in this SA Report. Summaries are presented in sections 5.2 to 5.4 and detailed matrices in Annex II.

2.3.18 Each of the sections 5.2 to 5.4 includes a map showing the location of the potential development sites assessed, a summary table of the overall assessment scores for each site and a brief summary of the likely significant effects and possible mitigation measures for each site. In the summary table of overall assessment scores, sites are presented in order of sustainability performance with the more sustainable sites towards the top and less sustainable sites towards the bottom. A sites' position in the table has been informed by the detailed assessment in Annex II and by calculating an overall score based on scores against each SA objective.

2.3.19 The assessment of each individual site has been informed by detailed evidence of likely effects and their significance and potential mitigation measures received from officers within the Council with specialist knowledge.

2.3.20 This SA assessment has informed the selection of sites by the Council for more detailed assessment, shown as Stage 4 in Figure 2.1.

2.4 Secondary, cumulative and synergistic effects assessment

2.4.1 Schedule 2 of the SEA Regulations requires that the assessment of effects include secondary, cumulative and synergistic effects. Secondary or indirect effects are effects that are not a direct result of the plan but occur away from the original effect or as a result of a complex pathway. Cumulative effects arise where several proposals individually may or may not have a significant effect, but in-combination have a significant effect due to spatial crowding or temporal overlap. Cumulative effects may arise from individual policies within a plan and also between different plans. Synergistic effects are when two or more effects act together to create an effect greater than the simple sum of the effects acting alone.

[15] Note that the assessment of potential sites at the Principal Settlements uses the revised SA Framework which was consulted on from 22nd May 2020 to 3rd July 2020 with the 'consultation bodies' (Natural England, Historic England, Environment Agency)

2.4.2 For the purposes of this assessment of the Local Plan Review, these types of effects have been identified, where relevant, in the assessment of Alternative Development Strategies (ADS) and the assessment of potential development sites at Principal Settlements. However, a more detailed analysis of these types of effects will be undertaken at the Reg 19 pre-submission stage when the plan will contain policies and allocated sites at the Market Towns.

2.5 Stage C- Prepare the SA Report

2.5.1 This is an Interim SA Report, prepared to accompany the informal consultation on the Local Plan Review (LPR). A SA Report, presenting the findings of Stages A and B will accompany the Reg 19 version of the LPR.

2.6. Stage D: Consulting on the Draft Plan and the Sustainability Appraisal Report

2.6.1 This Interim SA Report accompanies the informal consultation on the Local Plan Review (LPR).

2.6.2 In accordance with Reg 13 of the SEA Regulations, the SA Report will then be made available alongside the Reg 19 draft plan and copies of the documents sent to the three 'consultation bodies' – Natural England, Environment Agency and Historic England. As well as the 'consultation bodies', those *'persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan'* will be consulted.

3. Sustainability Appraisal Scoping

3.1 Introduction

3.1.1 The 'scoping' stage of the sustainability appraisal (SA) is the first stage in the process and involves identifying the scope and level of detail of the information to be included in the SA report. It sets out the context, objectives and approach of the assessment and identifies relevant environmental, economic and social issues and objectives.

3.1.2 The scoping stage is a key stage in the process and a Scoping Report has been produced which is a useful way of presenting information at the scoping stage. A key aim of the scoping procedure is to help ensure the SA process is proportionate and relevant to the plan being assessed.

3.2 Consultation requirements

3.2.1 When deciding on the scope and level of detail of the information to be included in the report, the plan-maker must consult the consultation bodies[16] – Natural England, Environment Agency and Historic England. These bodies were consulted on a Scoping Report[17] setting out the scope and level of detail of the information to be included in the SA, between 7th November 2017 and 19th December 2017. Further details on that consultation are set out in chapter 7 of that Scoping Report.

3.2.2 In May 2020, Wiltshire Council produced an updated draft Scoping Report for consultation. This was not a wholesale review but was undertaken to take account of the Climate Emergency acknowledged by Wiltshire Council in February 2019 and the commitment to seek to make the county of Wiltshire carbon neutral by 2030. Updates also take account of the revised NPPF published in February 2019 and 'made' neighbourhood plans in Wiltshire. The SA Framework was amended to improve the conciseness and clarity of the SA objectives and decision-aiding questions to ensure greater effectiveness when considering likely significant effects of the Wiltshire Local Plan.

3.2.3 The updated draft Scoping Report[18] was sent to the three 'consultation bodies' for their comments between 22nd May 2020 and 3rd July 2020 and comments received were considered before publishing a final Scoping Report[19]. The sections below summarising the different elements of the scoping stage refer to the September 2020 final version of the Scoping Report.

3.3 Identifying other relevant plans, programmes and sustainability objectives

3.3.1 The SEA Regulations[20] require that information should be provided on:

- *'The relationship [of the plan or programme] with other relevant plans and programmes'*
- *'The environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation'*

3.3.2 The Wiltshire Local Plan is prepared in the context of other plans and programmes. The Plan must comply with national planning policy and reflect other European, national, regional and local plans and strategies, providing an additional level of detail for the spatial planning framework. The Plan should be set in the context of national, regional and local objectives along with strategic planning, transport, social, economic and environmental policies. This assessment ensures that the objectives for assessing the Plan generally adhere to, and are not in conflict with, objectives found in other plans, programmes and policies. It can also be used to ascertain potential conflicts between objectives, which may need to be addressed as part of the process.

[16] Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 defines certain organisations with environmental responsibilities as consultation bodies. In England the consultation bodies are Historic England, Natural England and the Environment Agency.
[17] Wiltshire Local Plan Sustainability Appraisal Scoping Report (Wiltshire Council, February 2019)
[18] Wiltshire Local Plan Sustainability Appraisal/Strategic Environmental Assessment Draft Scoping Report (Wiltshire Council, May 2020)
[19] Wiltshire Local Plan Sustainability Appraisal/Strategic Environmental Assessment Scoping Report (Wiltshire Council, September 2020)
[20] Environmental Assessment of Plans and Programmes Regulations 2004

3.3.3 The methodology for undertaking this exercise is explained in chapter 3 of the July 2020 Scoping Report. All of the plans, programmes and policies assessed are listed in Table 3.1 of that report and further details of each one are contained in Appendix A of that report. The assessment covers the following topic areas:

- Air quality and environmental pollution
- Biodiversity
- Land and soil resources
- Water resources and flood risk
- Landscapes
- Population and housing
- Climatic factors and energy
- Transport
- Historic environment
- Healthy and inclusive communities
- Economy and enterprise
- Generic documents relevant to the Wiltshire Local Plan Review

3.4 Baseline characteristics

3.4.1 The SEA Regulations[21] require that the Environmental Report should provide information on:

- *'The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme'*

- *'any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(**a**) and the Habitats Directive'*

3.4.2 In addition to the requirements of the SEA Regulations, the statutory SA process requires the collection of additional information on social and economic characteristics of the plan area. Baseline information provides the basis for predicting and monitoring effects and helps identify sustainability problems and alternative ways of dealing with them. Sufficient information about the current and likely future state of the plan area is required to allow the plan's effects to be adequately predicted.

3.4.3 The collection of baseline data and the development of the SA framework should inform each other. The review and analysis of relevant plans and programmes also influences data collection. The collection of baseline data is an iterative process and should not be viewed as a one-off exercise conducted at this stage only. The data collected and list of relevant plans and programmes has been reviewed to ensure the most up-to-date baseline information is reflected within this SA report. In deciding what and how much baseline data to collect, the key determining factor is the level of detail required to appraise the plan proposal against the SA objectives.

3.4.4 An initial set of baseline data has been extracted from a wide range of available publications and datasets. Sources have included, among others, national government and government agency websites, census data and information provided by Wiltshire Council. No primary research has been conducted. Baseline information is presented in detail in the July 2020 SA Scoping Report, chapter 4 and Appendix B. It should also be noted that more detailed baseline information will be collated from internal and external sources for the various development locations proposed by the Local Plan Review and this will inform the ongoing SA.

3.5 Identifying key sustainability issues and problems

3.5.1 The requirement to identify sustainability problems and issues arises from the SEA Regulations[22], where the Environmental Report should include:

- *'any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(**a**) and the Habitats Directive'*

[21] Environmental Assessment of Plans and Programmes Regulations 2004
[22] Environmental Assessment of Plans and Programmes Regulations 2004

3.5.2 The identification of sustainability issues and problems in Wiltshire provides a means of defining key issues for the Plan and to influence the respective Plan objectives and options. The analysis of baseline data informs the key sustainability issues and problems and the development of the SA Framework.

3.5.3 This section describes the current situation and highlights the key issues faced within Wiltshire. It does not attempt to cover all of the issues but identifies those that are considered to be a priority in terms of sustainability. Key sustainability issues and problems have been derived by analysing the baseline data and contextual information from plans, programmes and policies, and assessing what the likely significant issues will be over the longer term i.e. 10 years +.

3.5.4 It should be noted that some of the sustainability issues and problems identified are not necessarily under the Plan's direct field of influence, for example an ageing population. However, it is considered important to reflect these where there may be indirect causality that can potentially be shaped by planning policies through the Plan.

3.5.5 Chapter 5 of the July 2020 Scoping Report presents the results of the analysis of key sustainability issues and problems for Wiltshire.

3.6 Developing the Sustainability Appraisal Framework

3.6.1 The final stage of scoping is the development of the SA Framework. The SA Framework is a key component in undertaking the SA by synthesising the plans, programmes and policies, the baseline information and sustainability issues into a systematic and easily understood tool that allows the prediction and assessment of effects considered likely to arise from the implementation of the Plan. Though the SEA Directive and Regulations do not specifically require the use of objectives in the SEA process, they are a recognised and useful way in which environmental effects can be described, analysed and compared at key stages of the plan development.

3.6.2 SA objectives and decision-aiding questions have been drawn up under the three sustainable development dimensions: social, economic and environmental. SA objectives for the Plan have been worded so that they reflect one single desired direction of change for the theme concerned and do not overlap with other objectives. They include both externally imposed social, environmental and economic objectives; as well as others devised specifically in relation to the context of the Plan. The SA objectives have also been worded to take account of local circumstances and concerns feeding from the analysis of sustainability issues.

3.6.3 A set of decision aiding questions has been derived to capture the change likely to arise from the Plan implementation and they play a role in the assessment itself. Detailed decision aiding questions can help to ensure that all the key issues to be considered in the SA are incorporated in the SA framework.

3.6.4 The SA Framework is included in Appendix A. This current version of the SA Framework has so far been applied in the assessment of potential development sites at Principal Settlements (Chapter 5) where the differentiation between site location proposals has been assessed. It should be noted that the previous SA Framework, included within the February 2019 SA Scoping Report, was applied in the assessment of the Alternative Development Strategies (ADS) (Chapter 4) because that was the current SA Framework at the time the ADS were assessed i.e. prior to May 2020 when the SA Scoping Report was updated and consulted on.

3.6.5 The SA Framework will be applied in the assessment of Plan policies and potential development sites at other settlements as the Plan progresses and the results will be documented in future iterations of the SA Report.

4. Assessment of Alternative Development Strategies

4.1 Introduction

4.1.1 On 30th April 2019, Wiltshire Council's Cabinet[23] approved next steps for the review of the Wiltshire Local Plan in relation to the development strategy and the testing of a range of employment and housing growth for Wiltshire over the period 2016 to 2036. This range includes consideration of Alternative Development Strategies (ADS) for different distributions of employment and housing growth by Housing Market Area (HMA) to be considered through the plan-making process in order to develop a preferred development strategy.

4.1.2 Cabinet on 26th March 2019 had previously agreed the extent of the proposed Chippenham HMA, Salisbury HMA, Swindon HMA (Wiltshire part) and Trowbridge HMA and that they were an appropriate basis for assessing housing and employment distribution within Wiltshire. The four HMAs, together with Functional Economic Market Area Assessment (FEMAA) boundaries which form the basis for disaggregating the need for employment land, are shown below.

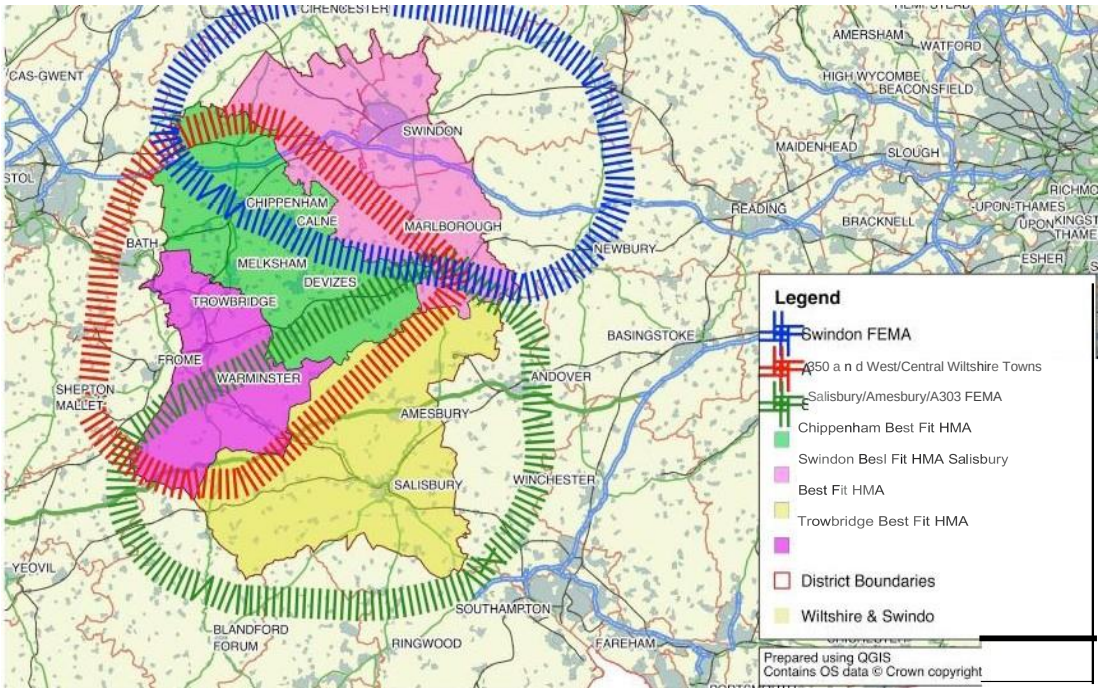


Figure 4.1: Wiltshire HMA and FEMAA boundaries

4.1.3 A report[24] presented to the 30th April 2019 Cabinet sets out the development of ADS for each of the four HMAs. It explains that the result of the Standard Method[25] is the starting point for plan-making and represents the minimum number of homes needed in the local authority area. Based on the latest government position, 40,840 homes would be the minimum local housing need for Wiltshire for the period 2016 to 2036.

4.1.4 However, national policy and advice also indicate that local planning authorities should keep their local housing needs assessment under review as new, more up-to-date data becomes available, and that, considering other factors, a local housing need figure higher than the standard method may be appropriate. Wiltshire Council and Swindon Borough Council commissioned a Local Housing Needs Assessment[26] (LHNA) in 2019 which suggests that a figure for local housing needs could take into

[23] Agenda and all supporting documents available on the Wiltshire Council website at https://cms.wiltshire.gov.uk/ieListDocuments.aspx?CId=141&MId=12497&Ver=4
[24] Wiltshire Local Plan Review Update: Strategy Development. Available on the Wiltshire Council website at: https://cms.wiltshire.gov.uk/documents/s160871/Report%20Wiltshire%20Local%20Plan%20Review%20Update%20-%20Strategy%20Development.pdf
[25] As per NPPF paragraph 60
[26] Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019 – Report of Findings (ORS, April 2019)

consideration longer term migration trends and anticipated growth in number of jobs in the county, and that 45,600 homes would be required for the period 2016-2036.

4.1.5 Evidence therefore suggests at this stage that the Wiltshire Local Plan Review (and SA) should consider and test a range of local housing needs from 40,840 to 45,600 homes for the period 2016 to 2036. The SA has therefore assessed the likely effects of delivering both higher and lower housing needs figures as 'reasonable alternatives' through various distribution options within the four HMAs. The basis for this assessment is the SA Framework as outlined in Chapter 2.

4.1.6 In terms of employment land, the Swindon and Wiltshire Functional Economic Market Area Assessment[27] (FEMAA) supported by the Wiltshire Employment Land Review (ELR) 2017[28] forms the basis for disaggregating the need for employment land in the county.

Disaggregating HMA housing and employment needs to Principal Settlements, Market Towns and Rest of HMA (rural areas)

4.1.7 The starting point for disaggregating HMA housing and employment needs was to test a straightforward proportionate roll forward of the Wiltshire Core Strategy distribution. This has then been used as a basis for identifying reasonable alternative development strategies to be further assessed through the SA. The methodology and possible distributions to each HMA and the Principal Settlements, Market Towns and Rest of HMA (rural areas) were set out in Cabinet 30th April 2019 papers[29] and subsequently approved by Cabinet.

4.1.8 The alternative strategies for each of the four HMAs are as follows:

Chippenham HMA – Alternative Development Strategies
Chippenham Strategy A (CH-A) - Roll forward the Core Strategy Housing and employment land requirements are increased by 45% and distributed pro-rata to roll forward the current strategy. New employment allocations proposed only at Calne, Corsham and Melksham.
Chippenham Strategy B (CH-B) - Chippenham Expanded Community More constrained settlements (Corsham, Calne, Devizes and Malmesbury) continue at Core Strategy rates of growth. Chippenham receives the balance. New employment allocations proposed only at Chippenham and Calne.
Chippenham Strategy C (CH-C) - Melksham Focus Housing requirements based on economic forecast for Melksham and follow a recent track record of sustained economic growth. The strategy diverts the scale of new housing away from settlements that are more environmentally constrained or sensitive. New employment land proposed only at Melksham and Corsham.

Salisbury HMA – Alternative Development Strategies
Salisbury Strategy A (SA-A) - Roll forward the Core Strategy Housing and employment land requirements are reduced by 11% and distributed pro-rata rolling forward the current strategy. New employment land proposed only at Salisbury/Wilton and Tidworth/Ludgershall.
Salisbury Strategy B (SA-B) - Focus on Salisbury Scales of housing development at Amesbury, Tidworth and Ludgershall are constrained to around current levels of commitments. The residual need is met at Salisbury. New employment land proposed only at Salisbury.
Salisbury Strategy C (SA-C) - Focus on the rest of the HMA Growth at Salisbury, Amesbury and Tidworth and Ludgershall constrained to around current levels of commitments. Remaining balance of housing needs focussed on the rural area. For employment, the rest of the HMA accommodates growth which follows development trends for small scale employment growth in the rural parts of the HMA.
Salisbury Strategy D (SA-D) - Boscombe/Porton New Community Housing at Salisbury, Amesbury and Tidworth/Ludgershall is constrained to current levels of commitments. Recognises that employment growth has taken place in the Boscombe and Porton area and directs housing growth to a new community related to this economic potential. New employment land proposed only at Boscombe and/or Porton.

[27] Swindon and Wiltshire Functional Economic Market Area Assessment (Hardisty Jones Associates, December 2016)
[28] Wiltshire Employment Land Review (Hardisty Jones Associates, May 2018)
[29] Appendix 4 – Chippenham Housing Market Area Assessment Summary; Appendix 5 - Salisbury Housing Market Area Assessment Summary; Appendix 6 - Swindon Housing Market Area Assessment Summary; Appendix 7 - Trowbridge Housing Market Area Assessment Summary.

Swindon HMA – Alternative Development Strategies
Swindon Strategy A (SW-A) - Roll forward the Core Strategy Housing and employment land requirements are reduced by 16% and distributed pro-rata rolling forward the current strategy.
Swindon Strategy B (SW-B) - Focus on Royal Wootton Bassett Development is constrained at Marlborough to current commitments. No further development beyond existing commitments west of Swindon. The balance is focussed on Royal Wootton Bassett. New employment land proposed only at Royal Wootton Bassett.
Swindon Strategy C (SW-C) - Focus on the rest of the HMA Growth in the rural area is set to levels achieved 2006-2016. Development is constrained at Marlborough to current commitments and 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.

Trowbridge HMA – Alternative Development Strategies
Trowbridge Strategy A (TR-A) - Roll forward the Core Strategy Housing and employment land requirements are decreased by 4% and distributed pro-rata rolling forward the current strategy.
Trowbridge Strategy B (TR-B) - Westbury Growth Point Housing requirements for Westbury are led by employment forecasts. Consequential reductions to reflect existing commitments are focussed on Bradford on Avon and Trowbridge. New employment land proposed only at Westbury.
Trowbridge Strategy C (TR-C) - Focus on the rest of the HMA Housing requirements for the rest of the HMA are aligned to actual rates of past house building. 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.

4.1.9 Each of the strategies shown above were assessed against the 11 SA objectives (and associated decision-aiding questions), contained in the SA Framework at the time this assessment was done i.e. prior to the SA Scoping Report being revised in May 2020. The focus was on the environmental, economic and social impacts that are likely to be significant for each strategy. The SA identifies (through a high-level assessment at this stage) likely positive and negative effects that the strategies may have and potential mitigation measures that may help reduce any adverse effects and/or maximise benefits.

4.1.10 For each SA objective, the assessment was undertaken on each settlement, including the rural area 'Rest of the HMA', for each strategy. Both the higher requirement (based on the LHNA, FEMAA and ELR) and lower requirement (based on the 'Standard Method', FEMAA and ELR) were assessed. A summary of the assessments follows.

4.2 Chippenham Housing Market Area (HMA)

4.2.1 In relation to the Chippenham HMA, the Local Housing Needs Assessment[30] (LHNA) proposes a 45% increase in the number of homes compared to the Wiltshire Core Strategy. Data from the Swindon and Wiltshire FEMAA and the Wiltshire Employment Land Review (ELR) indicates that about 61 ha of available employment land is needed in the Chippenham HMA; given the amount of employment land built since 2016, with planning permission or allocated in the development plan, there is a residual to identify of about 9 hectares.

Strategies based on LHNA, FEMAA and Wiltshire ELR (higher growth strategies)

4.2.2 Based on the findings of the LHNA, FEMAA and Wiltshire ELR, the following three strategies have been subject to SA:

[30] Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019 – Report of Findings (ORS, April 2019)

Table 4.1: Chippenham HMA - Proposed distribution of housing and employment requirements (LHNA, FEMAA, Wiltshire ELR)

Settlement/area	Strategy CH-A		Strategy CH-B		Strategy CH-C	
	Housing	Employment (ha)	Housing	Employment (ha)	Housing	Employment (ha)
Calne	2050	5	1440	2	1610	0
Chippenham	6441	0	9765	7	6930	0
Corsham	1740	2	1220	0	1365	4
Devizes	2870	0	2010	0	2250	0
Malmesbury	1260	0	885	0	990	0
Melksham	3199	2	2240	0	3950	5
Rest of HMA	2840	0	2840	0	3300	0
TOTAL	**20400**	**9**	**20400**	**9**	**20395**	**9**

4.2.3 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[31] for each strategy against each SA objective, and an overall score[32] for each strategy.

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Strategy CH-A	-1.6	-1.6	-1.3	-1.6	-1.6	-1.6	-1.6	1.3	1.7	-1.7	1.3	**-8.3**
Strategy CH-B	-1.3	-1.3	-1.1	-1.6	-1.3	-1.3	-1.4	0.9	1.3	-1.3	1.3	**-7.1**
Strategy CH-C	-1.6	-1.6	-1.1	-1.6	-1.4	-1.3	-1.3	1.4	1.3	-1.6	1.3	**-7.5**

4.2.4 A summary of the key findings is as follows:

- **Strategy CH-B** (Chippenham expanded community) is considered the 'more' sustainable strategy when considered against the other two strategies. CH-B is assessed as being 'more' sustainable against 8 of the 11 SA objectives, though sometimes jointly with other strategies.

- **Strategies CH-A and CH-C** are likely to have more adverse effects overall than CH-B because growth is distributed more evenly to all of the other settlements and Rest of HMA. This results in more significant likely adverse environmental effects in those other places.

- **As CH-B** focuses a significantly higher amount of the housing and employment at Chippenham and proportionately lower amounts at all of the other settlements and Rest of the HMA, most of the significant adverse effects and benefits relate to Chippenham, whilst many of the effects, both positive and negative, at the other locations are minor, with some notable exceptions. This strategy may be acceptable at Chippenham if accompanied by significant new infrastructure. However, the other settlements may not be able to provide sufficient affordable housing to meet demand or employment sites to allow local businesses to expand and to prevent out-commuting to larger settlements.

Recommendations and mitigation measures

- **Main Recommendation -** a key recommendation of this SA is to explore an additional/amended development strategy that would reduce proposed development levels in/around the more environmentally constrained settlements of Malmesbury, Corsham and Devizes to the lower levels in Strategy CH-B (or lower). Such a strategy would increase the growth requirement at the less environmentally constrained settlements of Melksham, Calne and Chippenham and in the Rest of the HMA. It is considered that such a strategy would reduce the likelihood of significant adverse environmental effects which would be problematic to mitigate in those more constrained settlements, whilst increasing benefits and providing

[31] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[32] Calculated by adding the scores for each SA objective for each strategy

more opportunities and greater viability for infrastructure provision in more suitable settlements that could reduce adverse effects still further.

- **Chippenham** - the proposed level of growth at Chippenham under all three strategies is significant and considered likely to have significant adverse effects on biodiversity, efficient and effective use of land, water resources, transport and environmental pollution, where mitigation measures are likely to be possible but problematic. Under CH-B where growth levels are significantly higher, there are also likely significant adverse effects on climate change adaptation, heritage assets and landscapes. However, at this stage, the assessment of likely significant effects is based on the level of growth proposed and a high-level assessment of constraints around the town, not on actual development locations, which are not known. Further, more detailed, assessment will be carried out at individual site level where more specific mitigation measures, including possible infrastructure provision that could reduce the likelihood of significant adverse effects, can be taken into account.

- **Chippenham** - under strategy CH-B where housing and employment growth levels are significantly higher, the assessment has found likely major benefits for affordable housing and employment provision, although this may be result in a shortfall in provision in other parts of the HMA where demand for affordable homes may be high, particularly in Malmesbury and Corsham, and where new employment sites may be needed to allow local businesses to expand. Major benefits could also be expected in terms of SA objective 9, supporting investment into areas suffering from deprivation and into health services. Additionally, this significant level of growth should be able to support new secondary level schooling provision which will reach capacity in forthcoming years.

- **Calne** – the town is considered less environmentally constrained than Malmesbury, Corsham and Devizes. However, higher growth strategies may have adverse effects on biodiversity, efficient and effective use of land, climate change adaptation, transport and heritage. The key issue is transport through the town centre where there is peak time congestion and a longstanding Air Quality Management Area (AQMA) in the town centre. Mitigation measures to reduce the effects of additional growth at higher levels could include robust sustainable transport measures that would reduce town centre traffic volumes, locating new development with good access and within easy walking/cycling distance to the town centre and ensuring that development is accompanied by highways infrastructure that could help resolve existing issues and reduce the effects of poor town centre air quality.

- **Calne** – under the ‘more’ sustainable strategy CH-B, existing housing commitments would deliver a significant proportion of the housing requirement for Calne, leaving just 250 additional dwellings to be identified to maintain supply to 2036. This is expected to have negative consequences for affordable housing provision - existing commitments would likely be built out within the next 10 years, meaning that there would be a low level of homes being delivered in the latter half of the plan period.

- **Corsham** – the assessment has found likely significant adverse effects in relation to biodiversity, heritage assets and landscapes for all strategies, where mitigation would be problematic. It is considered that Corsham is the most environmentally constrained settlement within the strategies and it is recommended that levels of growth are kept at a reduced level at Corsham to reduce the likelihood of significant environmental effects.

- **Devizes** – the assessment has found likely significant adverse effects in relation to biodiversity (CH–A), efficient and effective use of land (all strategies), environmental pollution (all strategies), climate change adaptation (all strategies), heritage (CH-A), landscapes (CH–A) and transport (all strategies where mitigation would be problematic to mitigate. The key issue is transport through the town centre where there is peak time congestion and a longstanding Air Quality Management Area (AQMA) at several locations in the town centre. Mitigation measures would need to be effective at reducing current air quality issues and these may include robust sustainable transport measures, locating new development with good access and within easy walking/cycling distance to the town centre and ensuring that development is accompanied by highways infrastructure that could help resolve existing issues. The levels of growth proposed under all strategies (ranging from 2010 to 2870 dwellings) and likely significant impacts on

traffic and air quality are considered problematic to mitigate and without significant investment in infrastructure, proposed growth levels could be reduced.

- **Malmesbury** – the assessment has found likely significant adverse effects in relation to water resources (CH-A), climate change adaptation (CH-A), heritage (CH-A) and landscapes (CH-A). Malmesbury is also significantly constrained in environmental terms, however, the relatively low growth levels proposed for the town under CH-B and CH-C would likely have minor adverse effects overall.

- **Melksham** – the assessment has found likely significant adverse effects in relation to biodiversity (CH-C), efficient and effective use of land (CH-A and CH-C), environmental pollution (all strategies), climate change adaptation (CH-A and CH-C), heritage (CH-C) and transport (CH-A and CH-C). It is the higher growth strategy for Melksham (CH-C) which is likely to have greater adverse effects on the environmental objectives but also greater social and economic benefits. However, there are fewer significant environmental constraints than at other towns and it is considered that Melksham could accommodate a higher amount of growth than is proposed under the 'more' sustainable strategy CH-B where the residual housing requirement would be just 890 dwellings and there would be no employment allocation.

- **Rest of the HMA** – the rural part of the HMA contains a number of important environmental designations but accurately assessing likely effects is difficult without knowing locations for development. It is considered that the higher level of growth proposed in strategy CH-C will have more significant adverse environmental effects, especially on landscapes as the presence of large national designations (AONB) as well as locally-valued landscapes mean that locations in Rest of HMA would have to be selected sensitively with adequate mitigation.

- **Rest of the HMA** - for strategies CH-A and CH-B, a continuation of relatively low levels of housing growth at rural settlements is considered likely to exacerbate affordability issues in rural parts of the HMA. Taking into account existing commitments, there is a residual requirement of just 1,470 homes for the Rest of the HMA for these two strategies which is considered likely to have adverse effects overall. A solution could be to increase the housing requirement to between CH-A/CH-B and CH-C requirements which would have greater benefits for rural settlements.

Strategies based on 'Standard Method', FEMAA and Wiltshire ELR (lower growth strategies)

4.2.5 Based on the findings of the 'Standard Method', FEMAA and Wiltshire ELR, the following three strategies have been subject to SA:

Table 4.2: Chippenham HMA - Proposed distribution of housing and employment requirements (Standard Method, FEMAA, Wiltshire ELR)

Settlement/area	Option CH-A		Option CH-B		Option CH-C	
	Housing	Employment (ha)	Housing	Employment (ha)	Housing	Employment (ha)
Calne	1750	5	1230	7	1375	0
Chippenham	5495	0	8335	2	5915	4
Corsham	1485	2	1040	0	1165	0
Devizes	2450	0	1715	0	1920	0
Malmesbury	1075	0	755	0	845	0
Melksham	2730	2	1910	0	3370	5
Rest of HMA	2425	0	2425	0	2815	0
TOTAL	17410	9	17410	9	17410	9

4.2.6 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[33] for each strategy against each SA objective, and an overall score[34] for each strategy.

[33] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[34] Calculated by adding the scores for each SA objective for each strategy

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Strategy CH-A	-1.4	-1.3	-1.3	-1.6	-1.6	-1.4	-1.3	1.0	1.0	-1.6	1.3	**-8.2**
Strategy CH-B	-1.3	-1.3	-1.1	-1.6	-1.3	-1.3	-1.4	0.9	1.3	-1.1	1.3	**-6.9**
Strategy CH-C	-1.3	-1.4	-1.1	-1.6	-1.3	-1.1	-1.3	1.1	1.1	-1.6	1.3	**-7.2**

4.2.7 A summary of the key findings is as follows:

- **Strategy CH-B** (Chippenham expanded community) is marginally considered the 'more' sustainable strategy, although CH-B and CH-C have virtually identical scores and at this level of growth, either strategy could come forward without significant sustainability impacts.

- **Strategy CH-A** is likely to have more adverse effects overall than the other two strategies because growth is distributed more evenly to all of the other settlements and Rest of HMA. This results in more significant likely adverse environmental effects in those other places.

- **As CH-B** focuses a significantly higher amount of the housing and employment at Chippenham and proportionately lower amounts at all of the other settlements and Rest of the HMA, most of the significant adverse effects and benefits relate to Chippenham, whilst many of the effects, both positive and negative, at the other locations are minor, with some notable exceptions.

- **Strategy CH-C** would still locate a significant level of growth to Chippenham with subsequent significant environmental effects and social and economic benefits, but this much reduced level compared with CH-B may not deliver the appropriate infrastructure to allow effective mitigation. Proposed growth at Melksham through this strategy is considerably higher than CH-B which may better deliver significant investment in infrastructure than through CH-B.

Recommendations and mitigation measures

- **Key Recommendation –** it is recommended that if possible, an amended or additional strategy could be explored that would reduce development levels in/around the more ecologically constrained settlements of Corsham and Malmesbury and in Devizes where there is traffic congestion and poor air quality in the town centre, and re-distribute growth at settlements with less ecological constraints, such as to Calne and Melksham. As Corsham lies within the Bath and Bradford on Avon Bats SAC, the settlement is considered to be the most sensitive to impacts on biodiversity.

- **Chippenham** – lower levels of housing growth under CH-A and CH-C is only likely to have minor benefits for the town as residual requirements would be just 884 and 1304 dwellings respectively in the plan period to 2036. CH-B is the only strategy of the three that would deliver an adequate supply of affordable housing to meet need.

- **Calne** – Calne has fewer environmental constraints but poor air quality and a designated AQMA in the town centre. Strategy CH-B would deliver 7ha of employment land but only a residual housing amount of 40 dwellings to 2036. It is recommended that the level of housing is significantly increased at Calne in order to meet needs and to provide solutions through infrastructure provision to traffic congestion and subsequent air quality issues.

- **Corsham** – it is recommended that a lower level of housing is provided at Corsham due to ecological constraints. Strategy CH-B would still leave a residual requirement of 565 dwellings at Corsham and this may be an appropriate balance given Corsham's location in relation to the SAC.

- **Devizes** – it is recommended that a lower level of housing is provided at Devizes due to ongoing air quality issues at various locations in the town centre and likely difficulty to mitigate these issues.

- **Malmesbury** – the town is constrained in heritage terms and it is recommended that a lower level of growth is directed to the town. However, it has also been noted that the ratio of house price to earnings in Malmesbury continues to be one of the highest in Wiltshire at 14.13 and delivery of affordable homes should be prioritised.

- **Melksham** – environmental constraints are fewer than at other towns in the HMA but if higher growth levels are directed to the town it must be accompanied by suitable infrastructure that will resolve existing pressures on the highway network.

- **Rest of the HMA** – lower levels of growth through strategies A and B are likely to have adverse effects in rural parts of the HMA as a continuation of relatively low levels of housing growth at small and large villages is likely to exacerbate affordability issues. It is considered that the rural areas are able to accommodate a higher level of growth.

Assessment of the Emerging Preferred Strategy for the Chippenham HMA

4.2.8 The emerging preferred strategy, which takes into account the SA findings of the Alternative Development Strategies, potential mitigation measures and recommendations is as follows. The SA assessment has been undertaken using the same 11 SA objectives in the SA Framework prior to its revision - this allows for a direct comparison to be made with the 'higher' and 'lower' growth strategies outlined above.

Table 4.3: Chippenham HMA – Emerging Preferred Strategy

Settlement/area	Emerging Preferred Strategy	
	Housing	Employment (ha)
Calne	1610	4
Chippenham	9225	5
Corsham	815	0
Devizes	1330	0
Malmesbury	665	0
Melksham	3950	0
Rest of HMA	2805	0
TOTAL	**20400**	**9**

4.2.9 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[35] against each SA objective, and an overall score[36] for the strategy.

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Emerging Preferred Strategy	-1.4	-1.4	-1.1	-1.4	-1.4	-1.4	-1.4	1.3	1.6	-1.3	1.6	**-6.3**

4.2.10 A summary of the key findings is as follows:

- This emerging preferred strategy achieves a better overall sustainability score than the overall scores for each of the other 'higher growth' and 'lower growth' strategies for Chippenham HMA, assessed previously.

- There are no likely significant adverse effects overall against any of the objectives.

- Given the relatively high growth levels at **Chippenham** and **Melksham**, there are likely to be significant adverse effects for many of the environmental objectives and transport. But on the other hand, significant benefits are likely for the social and economic objectives.

[35] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[36] Calculated by adding the scores for each SA objective for each strategy

- Environmental effects at the other places are generally minor, with some exceptions, given lower levels of proposed growth. Minor benefits are also expected against the social and economic objectives. To increase social and economic benefits outside of Chippenham and Melksham, it is suggested that housing and employment growth could be increased somewhat without detrimental effects on the environment.

- The assessment of this strategy is based on overall housing numbers in each settlement and the rural area and has not considered individual locations within those places. Those site assessments will be undertaken at a later stage in the plan's preparation, except for sites at Chippenham which have been assessed as part of this SA.

4.3 Salisbury Housing Market Area (HMA)

4.3.1 The LHNA 2019[37] suggests an overall reduction in the number of homes required within the HMA, which is 11% lower than the Wiltshire Core Strategy. Much of the need for new homes in this HMA will be met by the current supply of identified land. Data from the Swindon and Wiltshire FEMAA and the Wiltshire Employment Land Review (ELR) indicates that about 60 ha of available employment land is needed in the Salisbury HMA. Given the amount of employment land built since 2016, with planning permission or allocated in the development plan, there is a residual to identify of about 10 hectares.

Strategies based on LHNA, FEMAA and Wiltshire ELR (higher growth strategies)

4.3.2 Based on the findings of the LHNA, FEMAA and Wiltshire ELR, the following four strategies have been subject to SA:

Table 4.4: Salisbury HMA - Proposed distribution of housing and employment requirements (LHNA, FEMAA, Wiltshire ELR)

Settlement/area	Strategy SA – A (Current Strategy)		Strategy SA – B (Salisbury Focus)		Strategy SA – C (Focus on the Rest of the HMA)		Strategy SA – D (New Community)	
	Housing	Employment (ha)	Housing	Employment (ha)	Housing	Employment (ha)	Housing	Employment (ha)
Amesbury	2170	0	1230	0	1230	0	1230	0
Salisbury/Wilton	5390	8	6650	10	5390	3.5	4900	2
Tidworth/Ludgershall	1555	2	1210	0	1210	0.5	1210	0
New Community	0	0	0	0	0	0	2000	8
Rest of HMA	1855	0	1885	0	3145	6	1635	0
TOTAL	**10975**	**10**	**10975**	**10**	**10975**	**10**	**10975**	**10**

4.3.3 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[38] for each strategy against each SA objective, and an overall score[39] for each strategy.

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Strategy SA-A	-1.4	-1.0	-1.2	-1.0	-1.0	-1.2	-1.4	0	1.2	-1.0	1.2	**-6.8**
Strategy SA-B	-1.0	-1.0	-1.2	-1.0	-1.0	-1.2	-1.2	-0.2	1.0	-1.0	1.2	**-6.6**
Strategy SA-C	-1.2	-1.2	-1.4	-1.2	-1.2	-1.4	-1.2	-0.2	1.2	-1.2	1.2	**-7.8**
Strategy SA-D	-1.2	-1.2	-1.6	-1.2	-1.2	-1.6	-1.6	0	1.2	-1.4	1.4	**-8.4**

[37] Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019 – Report of Findings (ORS, April 2019)
[38] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[39] Calculated by adding the scores for each SA objective for each strategy

4.3.4 A summary of the main findings is as follows:

- **Strategies SA-A (Roll forward current strategy) and SA-B (Salisbury Focus)** are the better performing strategies i.e. more sustainable, with very similar scores, although SA-B is marginally the more sustainable. Both strategies are 'more' sustainable for 8 of the 11 SA objectives.

- **Strategy SA-B** performs marginally better i.e. less significant adverse effects where mitigation is more achievable, against the environmental objectives 1 – 7. However, SA-B is a less sustainable option in terms of social and economic considerations.

- **Strategy SA-D** (new community) performs better overall i.e. greater benefits, against the social and economic objectives 8 - 9 and 11 as the focus on a new community could benefit both the surrounding rural area and Amesbury as the nearest town through significant provision of affordable housing, new infrastructure, public transport networks, employment and public open space. Whilst this may cause short-term disruption to nearby communities, the longer-term benefits are likely to be significant. However, against environmental objectives 1 – 7 and transport objective 10, it is considered that SA-D is likely to have adverse effects overall.

Recommendations and mitigation measures

- **Key recommendation 1 -** whilst Strategy SA-B (Focus on Salisbury) has been shown to be the more sustainable strategy overall, there are likely significant environmental effects at Salisbury given several significant environmental constraints. It is recommended that growth levels be reduced at Salisbury to reduce the likelihood of significant effects and to re-distribute to other areas in the HMA.

- **Key recommendation 2 –** the SA has found that both Amesbury and Tidworth/ Ludgershall are likely to have minor adverse effects overall against environmental objectives and could possibly accommodate growth at a higher level. The scale of housing growth proposed for these settlements under all strategies is considered likely to have negative effects overall on affordable housing delivery with low or zero residual requirements. It is recommended that the higher requirements contained in Strategy SA-A are considered for both towns, whilst reducing requirements at Salisbury.

- **Key recommendation 3 –** the assessment of proposals for a new community in the Porton/Boscombe Down area has shown likely significant adverse effects against several environmental objectives. However, this is based on an unknown location at this time. Depending on location, these effects could be reduced through mitigation measures and infrastructure provision. The assessment has shown likely significant social and economic benefits from such a community. It is recommended that when further details of the location of a new community are known, further assessment of likely effects is undertaken.

- **Transport -** focusing the highest amount of growth at Salisbury is reasonable given it does have a range of transport options. However, significant adverse effects are identified at Salisbury because of existing issues with peak time congestion on the strategic road network and the possibility that additional growth will exacerbate this. The Salisbury Transport Strategy was refreshed to mitigate the effects of proposals in the Wiltshire Housing Site Allocations Plan (WHSAP) and this may need to be reviewed in order to establish further mitigation measures.

- **Transport –** an accurate assessment of the option to build a new community under SA-D is difficult at this stage given the uncertainty surrounding the option. The exact location, subsequent highway infrastructure, possible mitigation and the likelihood of sustainable travel

are all unknown at this stage. While it is acknowledged this offers an opportunity to integrate both sustainable transport services and a strong active travel environment within the new community, further assessment of this will only be possible at a future stage.

- **Transport -** growth in the Rest of the HMA, with higher levels in strategy SA-C, places development away from established sustainable transport provision. At this stage, development in these locations has been assessed negatively (significantly so at higher levels) due to the likelihood that it will not make efficient use of existing sustainable transport infrastructure and may increase private car usage. However, further, more detailed assessment of individual rural settlements and sites will help to clarify this.

- **Amesbury** – the town has been assessed as likely to have minor adverse effects overall against environmental objectives, with some exceptions i.e. biodiversity and landscape at higher growth level and heritage for all strategies. However, mitigation is achievable, and much will depend on the location of any future development sites. It is considered that the town could accommodate growth at a higher level.

- **Amesbury** – strategies SA-B and SA-C propose a housing requirement that reflects current commitments only. Taking into account existing commitments, there would be no residual requirement under this scenario, meaning that there is a risk of a hiatus in housing delivery in the latter part of the plan period, although the extent that this would happen is uncertain. It is considered that the scale of growth under this strategy would be likely to have a neutral effect on the supply of affordable homes for Amesbury and a higher requirement e.g. under SA-A, is recommended. Strategy SA-D includes the provision of a new community of 2,000 dwellings in the Porton/ Boscombe Down area, which could be close to Amesbury. If this is the case, it is considered that the scale of growth under this strategy would be likely to have a positive effect on the supply of affordable homes for Amesbury in the longer term. However, due to the lead time required to establish growth of this scale and form, it is unlikely to deliver until later in the plan period or later**.**

- **Salisbury** - because all four strategies propose a significant amount of growth at Salisbury, the assessment has found that significant adverse effects are likely on a range of environmental objectives. Mitigation is likely to be achievable but problematic given current issues and constraints around the city. For these impacts to be reduced, a possible solution would be to reduce the amount of housing and employment proposed for Salisbury.

- **Salisbury** – the only strategy considered likely to have benefits for affordable housing is SA-B which proposes a marginally higher level of growth than in the current Core Strategy. All other strategies propose a lower level of growth than currently and existing commitments would deliver a significant proportion of the housing requirement. It is unclear whether existing commitments would provide a consistent supply up to 2036 and the scale of growth under these strategies would be likely to have a negative effect on the supply of affordable homes for Salisbury and Wilton**.**

- **Tidworth/Ludgershall -** as with Amesbury, these towns have been assessed as likely to have minor adverse effects overall against environmental objectives, with some exceptions i.e. biodiversity at higher growth level under SA-A and for all strategies with regards water resources due to there being a large number of water protection designations in the area. However, there are fewer environmental constraints here and it is considered the area could accommodate growth at a higher level. The scale of housing growth under all strategies is considered likely to have negative effects overall on affordable housing delivery with low or zero residual requirements. It is recommended that a higher requirement is considered for Tidworth/Ludgershall.

Strategies based on 'Standard Method', FEMAA and Wiltshire ELR (lower growth strategies)

4.3.5 Based on the findings of the 'Standard Method', FEMAA and Wiltshire ELR, the following four strategies have been subject to SA:

Table 4.5: Salisbury HMA - Proposed distribution of housing and employment requirements (Standard Method, FEMAA, Wiltshire ELR)

Settlement/area	Strategy SA – A (Current Strategy)		Strategy SA – B (Salisbury Focus)		Strategy SA – C (Focus on the Rest of the HMA)		Strategy SA – D (New Community)	
	Housing	Employment (ha)	Housing	Employment (ha)	Housing	Employment (ha)	Housing	Employment (ha)
Amesbury	2070	0	1230	0	1230	0	1230	0
Salisbury/Wilton	5140	8	6345	10	5140	3.5	4675	2
Tidworth/Ludgershall	1485	2	1210	0	1210	0.5	1210	0
New Community	0	0	0	0	0	0	2000	8
Rest of HMA	1770	0	1685	0	2890	6	1560	0
TOTAL	10470	10	10470	10	10470	10	10470	10

4.3.6 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[40] for each strategy against each SA objective, and an overall score[41] for each strategy.

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Strategy SA-A	-1.4	-1.0	-1.2	-1.0	-1.0	-1.2	-1.4	0	1.2	-1.0	1.2	**-6.8**
Strategy SA-B	-1.0	-1.0	-1.2	-1.0	-1.0	-1.2	-1.2	-0.2	1.0	-1.0	1.2	**-6.6**
Strategy SA-C	-1.2	-1.2	-1.4	-1.2	-1.2	-1.4	-1.2	-0.2	1.2	-1.2	1.2	**-7.8**
Strategy SA-D	-1.2	-1.2	-1.6	-1.2	-1.2	-1.6	-1.6	0	1.2	-1.4	1.4	**-8.4**

4.3.7 A summary of the main findings is as follows:

- Using the 'Standard Method' to calculate housing need results in a need for 10,470 dwellings in the HMA, compared with 10,975 under LHNA. This is not a significantly different figure, especially when considering the distribution at a settlement level. The SA findings are consequently very similar to the assessment of LHNA distributions for this HMA and the recommendations and mitigation noted earlier for LHNA also apply here.

- **Strategy SA-B** is considered the most sustainable, closely followed by SA-A. There is little difference between the two strategies in sustainability terms.

- **Strategy SA-D** is considered the least sustainable strategy.

Recommendations and mitigation measures

- Refer to recommendations and mitigation noted earlier for Salisbury HMA under the LHNA method. The SA findings for 'Standard Method' are very similar to the assessment of LHNA distributions given there is little difference in the figures and the recommendations and mitigation noted earlier also apply here.

- Given significant environmental constraints at **Salisbury**, it is recommended that higher levels of housing and employment are directed to **Amesbury** and **Tidworth/Ludgershall**. Strategy SA-B also allocates all employment to Salisbury and none to Amesbury or Tidworth/Ludgershall and this may need to be reviewed so that those settlements are allocated some employment.

[40] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[41] Calculated by adding the scores for each SA objective for each strategy

- The SA has taken a cautious approach to likely effects of development of a **new community** because the location is not known. In the Porton/Boscombe Down area there are significant heritage, ecology and landscape designations so the SA reflects this. It is considered that the scale of growth would be likely to have significant benefits on the supply of affordable homes in the HMA in the longer term and could also benefit Amesbury which sees a significant drop in its requirement in Strategy SA-B. However, due to the lead time required to establish growth of this scale and form, it is unlikely to deliver until later in the plan period.

Assessment of the Emerging Preferred Strategy for the Salisbury HMA

4.3.8 The emerging preferred strategy, which takes into account the SA findings of the Alternative Development Strategies, potential mitigation measures and recommendations, is as follows. The SA assessment has been undertaken using the same 11 SA objectives in the SA Framework prior to its revision. This allows for a direct comparison to be made with the 'higher' and 'lower' growth strategies.

Table 4.6: Salisbury HMA – Emerging Preferred Strategy

Settlement/area	Emerging Preferred Strategy	
	Housing	Employment (ha)
Amesbury	1635	0
Salisbury	5240	5
Wilton	400	0
Tidworth/Ludgershall	1555	5
Rest of HMA	2140	0
TOTAL	10970	10

4.3.9 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[42] against each SA objective, and an overall score[43] for the strategy.

Emerging Preferred Strategy	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
	-1.4	-1.0	-1.4	-1.0	-1.0	-1.2	-1.4	0.2	1.0	-1.0	1.2	**-7.0**

4.3.10 A summary of the key findings is as follows:

- This emerging preferred strategy for Salisbury HMA achieves a similar overall sustainability score to 'higher growth' and 'lower growth' strategy SA-A and a significantly better score than strategies SA-C and SA-D. However, 'higher growth' and 'lower growth' strategies for SA-B remain the better performing strategies in sustainability terms.

- The emerging preferred strategy has no likely significant effects, either positive or negative, against any of the objectives. However, given the relatively high growth levels proposed at Salisbury/Wilton, there are likely to be significant adverse effects against many of the environmental objectives and for transport.

- At **Salisbury/Wilton**, existing housing commitments would deliver a significant proportion of the housing requirement. It is unclear whether existing commitments would provide a consistent supply up to 2036. This emerging strategy for 5240 dwellings is less than the current Core Strategy requirement of 6060 dwellings. This strategy is likely to have only minor benefits in terms of housing provision (including affordable housing) for Salisbury and Wilton overall.

[42] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[43] Calculated by adding the scores for each SA objective for each strategy

- Environmental effects at the other places are generally minor, with some exceptions, given lower levels of proposed growth. Minor benefits generally are also expected against the social and economic objectives.

- At **Amesbury**, minor positive effects only for housing provision are considered most likely for this emerging strategy as, taking into account existing commitments, a residual requirement of just 349 dwellings would be required for the plan period. It is suggested that the housing requirement for Amesbury could be increased to increase these benefits.

- At **Tidworth/Ludgershall**, neutral effects only are considered most likely for housing provision. The residual requirement for Tidworth/Ludgershall would be just 166 dwellings which would mean that the rate of house building could drop notably for the latter part of the plan period under this scenario. It is suggested that the housing requirement for Tidworth/Ludgershall could be increased to increase benefits from housing provision.

- The assessment of this strategy is based on overall housing numbers in each settlement and the rural area and has not considered individual locations within those places. Those site assessments will be undertaken at a later stage in the plan's preparation, except for sites at Salisbury which have been assessed as part of this SA.

4.4 Swindon Housing Market Area (HMA)

4.4.1 The LHNA 2019[44] for Swindon HMA (Wiltshire part) proposes a 16% decrease in the number of homes compared to the Wiltshire Core Strategy. For the purpose of testing strategy options within this HMA, it is assumed that the area will not accommodate any of Swindon's local housing need. Regardless of this position, as an allowance was made in the Core Strategy (Core Policy 2) for housing at West of Swindon, this location is included in the discussion of strategy options for testing at this stage.

4.4.2 Data from the Swindon and Wiltshire FEMAA and the Wiltshire ELR indicates that about 11 ha of available employment land is needed in the Swindon (Wiltshire part) HMA. Given the amount of employment land built since 2016, with planning permission or allocated in the development plan, there is a residual to identify of about 6 hectares.

Strategies based on LHNA, FEMAA and Wiltshire ELR (higher growth strategies)

4.4.3 Based on the findings of the LHNA, FEMAA and Wiltshire ELR, the following three strategies have been subject to SA:

Table 4.7: Swindon HMA - Proposed distribution of housing and employment requirements (LHNA, FEMAA, Wiltshire ELR)

Settlement/area	Strategy SW – A (Current Strategy)		Strategy SW – B (Royal Wootton Bassett Focus)		Strategy SW – C (Rest of HMA Focus)	
	Housing	Employment	Housing	Employment	Housing	Employment
Marlborough	570	4	485	0	680	3
Royal Wootton Bassett	900	2	1255	6	835	0
West of Swindon	755	0	485	0	485	0
Rest of HMA	1030	0	1030	0	1255	3
TOTAL	**3255**	**6**	**3255**	**6**	**3255**	**6**

4.4.4 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[45] for each strategy against each SA objective, and an overall score[46] for each strategy.

[44] Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019 – Report of Findings (ORS, April 2019)
[45] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[46] Calculated by adding the scores for each SA objective for each strategy

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Strategy SW-A	-1.25	-1.0	-1.0	-1.25	-1.25	-1.5	-1.25	0.5	1.0	-1.0	1.0	**-7.0**
Strategy SW-B	-1.0	-1.0	-0.75	-1.0	-1.0	-1.0	-1.0	0.5	1.0	-1.0	1.25	**-5.0**
Strategy SW-C	-1.25	-1.0	-0.75	-1.25	-1.0	-1.5	-1.25	0.25	1.0	-1.25	1.25	**-6.75**

4.4.5 A summary of the main findings is as follows:

- **Strategy SW-B (Focus on Royal Wootton Bassett)** is considered the most sustainable strategy overall, consistently scoring better than the other strategies against the SA objectives.
- **Strategies SW-A and SW-C** are considered the least sustainable strategies.
- The relatively high overall scores for the strategies in this HMA, particularly SW-B, compared with the other three HMAs, is an indication of relatively fewer environmental constraints in this area, and at Royal Wootton Bassett in particular.

Recommendations and mitigation measures

- **Key Recommendation 1 –** a strategy that focuses a higher level of growth at Royal Wootton Bassett i.e. Strategy SW-B, has been shown to be a clearly more sustainable strategy. Marlborough and West of Swindon have several environmental constraints that limit growth opportunities. Royal Wootton Bassett and the Rest of the HMA are considered able to accommodate higher levels of growth that could help sustain and provide new services and facilities.
- **Key recommendation 2 –** all strategies propose a relatively low level of growth at Marlborough; this is unlikely to have benefits for affordable housing provision. Existing commitments would deliver most of the housing requirement, leaving a very low residual requirement. This would adversely affect current affordability trends and affordability would continue to be a significant issue for the town. The provision of affordable housing at Marlborough should be prioritised to meet identified needs, in specific locations that could help reduce the likelihood of significant environmental effects. The SA has suggested exploring the idea of the application of a specific affordable housing policy requirement for the town that is higher than for other parts of Wiltshire, subject to viability testing.
- **Marlborough –** SW-A and SW-C propose a good amount of employment land (4ha and 3ha respectively) but this is unlikely to be matched by the scale of housing to be provided. The high affordability ratio for housing at Marlborough is still likely to be a strong factor in relation to commuting patterns, meaning that employees based at the new employment locations are likely to travel to Marlborough from elsewhere. Provision of 3ha/4ha of employment land is therefore unlikely to redress any travel to work imbalance but will still be positive in providing sites for local business expansion and inward investment.
- **Royal Wootton Bassett –** At this strategic high-level of assessment, Royal Wootton Bassett is considered not to be significantly constrained environmentally and is able to accommodate a higher level of housing and employment provision due to this and the existing infrastructure, services and facilities, without leading to adverse effects that would be difficult to mitigate. However, more detailed assessment of individual sites will conclude whether this is the case.
- **Royal Wootton Bassett –** As SW-B focuses mostly on Royal Wootton Bassett, there are often less adverse effects but also less benefits at the other places. Higher growth at Royal Wootton Bassett is likely to have significant benefits for housing provision, especially affordable housing. However, if there is to be significant progress in resolving the issues of a lack of GP capacity and school places in the town, a higher amount of growth may need to be considered as part of a strategy.

- **West of Swindon** – the higher growth option (SW-A) is assessed as significant adverse in terms of heritage assets as there are a number of historic buildings in the area, there is a need to avoid compromising the separate character of Lydiard Millicent and Purton and to protect the settings of Purton and Lydiard Millicent Conservation Areas.

- **West of Swindon** - the higher growth option (SW-A) is assessed as significant adverse in terms of flood risk as much of the area is within Flood Zones 2 and 3 associated with the River Ray which restricts developable areas**.**

Strategies based on 'Standard Method', FEMAA and Wiltshire ELR (lower growth strategies)

4.4.6 Based on the findings of the 'Standard Method', FEMAA and Wiltshire ELR, the following three strategies have been subject to SA:

Table 4.8: Swindon HMA - Proposed distribution of housing and employment requirements (Standard Method, FEMAA, Wiltshire ELR)

Settlement/area	Strategy SW – A (Current Strategy)		Strategy SW – B (Royal Wootton Bassett Focus)		Strategy SW – C (Rest of HMA Focus)	
	Housing	Employment (ha)	Housing	Employment (ha)	Housing	Employment (ha)
Marlborough	515	4	435	0	615	3
Royal Wootton Bassett	810	2	1130	6	755	0
West of Swindon	680	0	435	0	435	0
Rest of HMA	930	0	930	0	1130	3
TOTAL	2935	6	2930	6	2935	6

4.4.7 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[47] for each strategy against each SA objective, and an overall score[48] for each strategy.

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Strategy SW-A	-1.0	-1.0	-1.0	-1.0	-1.25	-1.5	-1.25	0.5	1.0	-1.0	1.0	**-6.5**
Strategy SW-B	-1.0	-1.0	-0.75	-1.0	-1.0	-1.0	-1.0	0.5	1.0	-1.0	1.25	**-5.0**
Strategy SW-C	-1.25	-1.0	-0.75	-1.25	-1.0	-1.5	-1.25	0.25	1.0	-1.0	1.25	**-6.5**

4.4.8 A summary of the main findings is as follows:

- **Strategy SW-B (Focus on Royal Wootton Bassett)** is considered the most sustainable strategy overall, scoring significantly higher when compared against SW-A and SW-C.

- **Strategies SW-A and SW-C** are considered the least sustainable strategies.

Recommendations and mitigation measures

- The overall strategy figures and distribution to individual settlements is not significantly different to those calculated under LHNA and therefore the recommendations and mitigation are very similar to those noted earlier.

- A strategy that focuses a higher level of growth at **Royal Wootton Bassett** is clearly the more sustainable strategy. Growth opportunities at **Marlborough** and **West of Swindon** are limited by several environmental constraints.

[47] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[48] Calculated by adding the scores for each SA objective for each strategy

- **Royal Wootton Bassett** and the **Rest of the HMA** are considered able to accommodate higher levels of growth that could help sustain and provide new services and facilities.

- The concerns over the relatively low level of housing at **Marlborough** are magnified with the Standard Method approach as numbers are even lower than under LHNA. Residual requirements after existing commitments have been taken into account would be nil or very small and the plan is to 2036. This would significantly adversely affect affordability in the town. The provision of affordable housing at Marlborough should be prioritised to meet identified needs. Even though Marlborough is entirely within the AONB, the town must be able to meet its housing needs and it is likely that there are some sites in specific locations where adverse effects could be effectively mitigated. The SA has suggested exploring the idea of the application of a specific affordable housing policy requirement for the town that is higher than for other parts of Wiltshire, subject to viability testing.

Assessment of the Emerging Preferred Strategy for the Swindon HMA

4.4.9 The emerging preferred strategy, which takes into account the SA findings of the Alternative Development Strategies, potential mitigation measures and recommendations, is as follows. The SA assessment has been undertaken using the same 11 SA objectives in the SA Framework prior to its revision. This allows for a direct comparison to be made with the 'higher' and 'lower' growth strategies.

Table 4.9: Swindon HMA – Emerging Preferred Strategy

Settlement/area	Emerging Preferred Strategy	
	Housing	Employment (ha)
Marlborough	680	0
Royal Wootton Bassett	1255	6
West of Swindon	435	0
Rest of HMA	1080	0
TOTAL	3450	6

4.4.10 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[49] against each SA objective, and an overall score[50] for the strategy.

Emerging Preferred Strategy	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
	-1.25	-1.0	-0.75	-1.25	-1.0	-1.25	-1.25	0.5	1.0	-1.25	1.25	**-6.25**

4.4.11 A summary of the key findings is as follows:

- This emerging preferred strategy for Swindon HMA achieves a better overall sustainability score than 'higher growth' and 'lower growth' strategies SW-A and SW-C. However, 'higher growth' and 'lower growth' strategies for SW-B remain the better performing strategies in sustainability terms. This is primarily due to less significant adverse environmental effects at Marlborough as SW-B strategies propose lower levels of growth there.

- This emerging preferred strategy has no likely significant effects, either positive or negative, against any of the objectives.

- The level of growth proposed at **Marlborough** is considered likely to have significant adverse effects in relation to biodiversity, environmental pollution, historic environment, landscapes and transport. However, this assessment has not assessed individual development sites and there may be locations where development could take place where such impacts, with mitigation, could be reduced.

[49] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[50] Calculated by adding the scores for each SA objective for each strategy

- This strategy would not deliver any employment land at **Marlborough** and existing commitments would still deliver the majority of the housing requirement for the town. It is considered that the low scale of growth under this strategy would be unlikely to affect current trends to any notable degree and affordability would continue to be a significant issue for the town. Therefore, it is predicted that this strategy would have minor adverse effects on affordability for Marlborough over the course of the plan period to 2036.

- The level of growth proposed at **Royal Wootton Bassett** is not considered likely to have any significant adverse effects but is likely to have significant benefits in terms of housing provision and economic development.

- The assessment of this strategy is based on overall housing numbers in each settlement and the rural area and has not considered individual locations within those places. Those site assessments will be undertaken at a later stage in the plan's preparation.

4.5 Trowbridge Housing Market Area (HMA)

4.5.1 The LHNA 2019[51] review proposes a 4% decrease in the number of homes compared to the Wiltshire Core Strategy.

4.5.2 Data from the Swindon and Wiltshire FEMAA and the Wiltshire ELR indicates that about 50 ha of available employment land is needed in the Trowbridge HMA. Given the amount of employment land built since 2016, with planning permission or allocated in the development plan there is a residual to identify of about 1 hectare. The ELR 2017 notes that the Council should look to allocate more employment land at Trowbridge. The ELR scenarios vary as to the demand for new premises, but the study notes there may be a lack of demand because supply is not materialising at the town. This will need further consideration through plan making.

Strategies based on LHNA, FEMAA and Wiltshire ELR (higher growth strategies)

4.5.3 Based on the findings of the LHNA, FEMAA and Wiltshire ELR, the following three strategies have been subject to SA:

Table 4.10: Trowbridge HMA - Proposed distribution of housing and employment requirements (LHNA, FEMAA, Wiltshire ELR)

Settlement/area	Strategy TR – A (Current Strategy)		Strategy TR – B (Westbury Growth Point)		Strategy TR – C (Greater Rural Focus)	
	Housing	Employment	Housing	Employment	Housing	Employment
Bradford on Avon	570	1	570	0	300	0
Trowbridge	6520	0	5400	0	6130	0
Warminster	1840	0	1950	0	1840	0
Westbury	1435	0	2130	1	1530	0
Rest of HMA	635	0	950	0	1200	1
TOTAL	**11000**	**1**	**11000**	**1**	**11000**	**1**

4.5.4 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[52] for each strategy against each SA objective, and an overall score[53] for each strategy.

[51] Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019 – Report of Findings (ORS, April 2019)
[52] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[53] Calculated by adding the scores for each SA objective for each strategy

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Strategy TR-A	-1.6	-1.4	-1.4	-1.6	-1.4	-1.2	-1.4	0.6	1.2	-1.2	1.4	**-8.0**
Strategy TR-B	-1.8	-1.6	-1.6	-1.6	-1.4	-1.4	-1.4	1.0	1.4	-1.4	1.4	**-8.4**
Strategy TR-C	-1.4	-1.6	-1.4	-1.4	-1.6	-1.4	-1.4	0.6	1.4	-1.2	1.2	**-8.2**

4.5.5 A summary of the main findings is as follows:

- There is very little difference in the overall sustainability of the three strategies. There are only 0.4 points separating the 'more' sustainable strategy from the 'less' sustainable strategy, so the difference between them is marginal, unlike the assessment of the other three HMAs where there is a clearer more sustainable option.

- The relatively low overall scores for the strategies in this HMA compared with the other three HMAs (generally between -5.5 and -7.5) is an indication of a greater number of environmental constraints at Trowbridge where the highest amount of growth is proposed.

- **Strategy TR-A (roll forward Core Strategy)** is marginally the more sustainable. TR-B (Westbury Growth Point) is marginally the less sustainable of the three strategies. However, given how marginal the findings are, the main conclusion of the SA is that the most sustainable way forward would be a new hybrid strategy that combines the more sustainable elements of these three strategies.

- **Strategies TR-A and TR-C** are found to be the more sustainable options overall against the environmental objectives (1-7) and transport (10). This can be explained by the distribution of growth generally being more at Trowbridge and less at the other settlements, thereby reducing potential environmental impacts at those other settlements because the main significant impacts are at Trowbridge.

- **Strategy TR-B** is found to be marginally more sustainable against the social and economic objectives (8-9 and 11) as there are likely to be significant benefits overall at Trowbridge and Westbury as a significant amount of growth is proposed at both towns. The findings for TR-A and TR-C are affected by lower proposed growth at towns such as Bradford on Avon, Warminster, Westbury and Rest of HMA which has resulted in some neutral or negative scores that has brought overall scores down.

Recommendations and mitigation measures

- **Key Recommendation** – given the summary of main sustainability issues and mitigation discussed below, and particularly the significant existing environmental constraints at the Principal Settlement of Trowbridge, it is recommended that a new strategy is formulated that reduces the housing requirement at Trowbridge and possibly at Bradford on Avon. This could be re-distributed to Warminster, Westbury and possibly to rural areas, or to a different HMA. If this is not considered possible, consideration could be given to the following:

    - a focus on delivering brownfield sites in Trowbridge town centre;

    - an assessment of potential available sites that are not adjacent to the Trowbridge town boundary i.e. further away from the town boundary, but that could have less environmental impacts than sites that are closer to the town; and

    - a review of the Green Belt at Trowbridge and Bradford on Avon which could free up certain sites on the edge of the towns that may not significantly affect the openness of the Green Belt.

- **Bradford on Avon –** the town is very constrained in terms of biodiversity, transport (and subsequent air quality issues) and on local landscapes, at the higher levels of growth particularly. The town is also highly constrained by Green Belt, considerably limiting land available for housing development. This would lead to the conclusion that growth should be kept at lower levels. However, in terms of affordability, the house price to earnings ratio has risen significantly from 9.84 in 2008 to 14.04 in 2017; these are the highest in the HMA, yet delivery of affordable housing is the lowest. The SA recommends that provision of affordable housing at the town is prioritised to meet identified needs, perhaps through application of a specific affordable housing policy requirement for the town that is higher than for other parts of Wiltshire, subject to viability testing.

- **Bradford on Avon** – given the above, a further recommendation to make more land available might be a review of the Green Belt surrounding the town which could free up certain sites on the edge of the town that would not significantly affect the openness of the Green Belt but would have significant benefits for affordability.

- **Trowbridge** – as a Principal Settlement, Trowbridge would be expected to accommodate significant levels of growth, which are proposed in all three strategies (ranging from 5400 to 6520 dwellings). However, the town is constrained by significant issues relating to i) biodiversity (European protected bat species) ii) efficient and effective use of land (a high proportion of Grade 3 Best and Most Versatile (BMV) agricultural land borders the urban area of Trowbridge) and iii) landscapes (the West Wiltshire Green Belt comes up to the edge of the town in the north and west, the villages of Hilperton, North Bradley and Southwick are in close proximity to the town and there are significant areas of ancient woodland to the south and east). These issues restrict the availability of land for development and are considered likely to have significant adverse effects against relevant SA objectives that would be difficult to mitigate.

- **Trowbridge** – to help mitigate the likely significant effects noted above, see key recommendation above. There is a shortage of available greenfield sites on the edge of the town that would not have significant adverse environmental effects through development. Several possibilities for mitigating these effects are suggested.

- **Warminster** – the level of proposed growth at Warminster in all three strategies is similar and relatively low. There are likely significant adverse environmental effects specifically relating to the River Avon SAC and issues of surface water and groundwater flooding in the town. However, it is considered that Warminster could, in environmental terms, accommodate a higher level of growth than is proposed. Likely environmental effects are not as significant as in other parts of the HMA.

- **Warminster** – the relatively low housing provision in the strategies is a significant issue. Considering existing commitments, the strategies leave a residual requirement of between just 50 – 160 dwellings to 2036. This effectively ties growth to current levels of commitments and would mean a falloff in provision in the latter years of the plan period. Housing delivery in Warminster since 2006 has been below expected rates and this is primarily due to delays in bringing forward the strategic allocation to the west of the town. However, those homes that have been built have provided affordable housing above target rates. Such a low residual requirement would only be likely to have neutral or minor effects on the supply of affordable homes at the town and to mitigate this, the housing requirement could be increased as part of a new strategy.

- **Westbury** – the strategy that proposes the highest level of growth at Westbury, TR-B, is considered likely to have a number of significant adverse effects. However, the significance of any effects is very much dependant on where any new development is located, which is not known at this stage. Westbury is the least constrained in environmental terms of all the settlements in this HMA and mitigation measures are likely to be achievable for most of these issues.

- **Westbury** – the main issue at Westbury is the A350 which suffers from peak time congestion on its route through the town centre. The extent to which mitigation can reduce additional congestion and maximise sustainability is currently uncertain. Westbury has a longstanding Air

Quality Management Area (AQMA) which is directly related to peak time traffic through the town centre. Whether new development and associated infrastructure can help relieve this issue or exacerbate it is uncertain at this time and this will also partly depend on location.

- **Westbury –** under strategy TR-B, taking into account existing commitments, a residual requirement of just 1025 dwellings will need to be found to 2036. Given the relatively unconstrained nature of the town in environmental terms, it is considered that the housing requirement could be increased. However, solutions to the issues of peak time traffic congestion and subsequent poor air quality will need to be found. These solutions may involve improving sustainable transport options in the town, locating development that will reduce the need to travel by private car and potential new road infrastructure that will take through traffic away from the town centre.

- **Rest of the HMA** – housing requirements in the rural parts of the HMA range from 635 dwellings in TR-A to 1200 dwellings (residual 820) in TR-C. The Rest of the HMA covers a wide geographical area and it is considered possible for this area to accommodate a higher level of growth without significant environmental effects, depending on its location. An increase in levels of housing growth at small and large villages, compared to Strategies TR-A and TR-B is, however, unlikely to have a great effect on affordability issues in rural parts of the HMA i.e. reverse the trend, but will provide more opportunities to deliver affordable homes and help the viability of village services and facilities.

Strategies based on 'Standard Method', FEMAA and Wiltshire ELR (lower growth strategies)

4.5.6 Based on the findings of the 'Standard Method', FEMAA and Wiltshire ELR, the following three strategies for Trowbridge HMA have been subject to SA:

Table 4.11: Trowbridge HMA - Proposed distribution of housing and employment requirements (Standard Method, FEMAA, Wiltshire ELR)

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

4.5.7 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[54] for each strategy against each SA objective, and an overall score[55] for each strategy.

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Strategy TR-A	-1.6	-1.4	-1.4	-1.6	-1.4	-1.2	-1.4	0.2	1.2	-1.2	1.2	**-8.6**
Strategy TR-B	-1.8	-1.6	-1.6	-1.6	-1.4	-1.2	-1.4	0.4	1.4	-1.4	1.4	**-8.8**
Strategy TR-C	-1.4	-1.6	-1.4	-1.4	-1.4	-1.4	-1.4	0.2	1.2	-1.2	1.2	**-8.6**

4.5.8 A summary of the main findings is as follows:

- Like the assessment for LHNA, there is little difference in the overall sustainability of the three strategies. The most sustainable strategies are TR-A and TR-C and TR-B is the least sustainable strategy, however the difference between them is marginal

[54] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[55] Calculated by adding the scores for each SA objective for each strategy

- The overall scores are lower than the assessment of LHNA and this can be explained by the fact that under the Standard Method, housing requirements at settlements such as Warminster are lower and taking into account existing commitments, this would actually leave no residual requirement to find in the Plan period. This means that, apart from existing commitments, no additional dwellings would be required in the latter part of the plan period to 2036, resulting in a hiatus of activity. This is likely to have significant adverse effects on housing provision in the town, particularly for affordable housing.

Recommendations and mitigation measures

- The overall strategy figures and especially the distribution to individual settlements is not significantly different to those calculated under LHNA and therefore the recommendations and mitigation are very similar to those noted earlier.

- The **Key Recommendation** remains the same - given the significant existing environmental constraints at the Principal Settlement of Trowbridge, it is recommended that a new strategy is formulated that reduces the housing requirement at Trowbridge and possibly at Bradford on Avon with increases at Warminster, Westbury and in the rest of the HMA.

- **Warminster** – the strategies under Standard Method would leave no residual requirement - this effectively ties growth to current commitments and would mean a hiatus in housing development. Housing delivery in Warminster since 2006 has been below expected rates, however those homes that have been built have provided affordable housing above target rates. Leaving no residual requirement would only be likely to have negative effects on the supply of affordable homes at the town and to mitigate this, the housing requirement could be increased as part of a new strategy.

- **Bradford on Avon –** under the Standard Method housing requirements are even lower. The environmental constraints at the town have been noted but so have the affordability issues. The house price to earnings ratio has risen significantly in recent years yet delivery of affordable housing is the lowest. Provision of affordable housing should be prioritised to meet identified needs.

- **Trowbridge –** as stated earlier, there are several options that could be considered given the significant environmental constraints at and around the town; i) consider a significant reduction in housing requirement ii) a focus on delivering brownfield sites in Trowbridge town centre iii) assess available sites that are not adjacent to the Trowbridge town boundary i.e. further away from the town boundary, for possible allocation iv) review the Green Belt at Trowbridge and Bradford on Avon which could free up certain sites on the edge of the towns.

Assessment of the Emerging Preferred Strategy for the Trowbridge HMA

4.5.9 The emerging preferred strategy, taking into account the SA findings, potential mitigation measures and recommendations, is as follows. The SA assessment has been undertaken using the same 11 SA objectives in the SA Framework prior to its revision. This allows for a direct comparison to be made with the 'higher' and 'lower' growth strategies.

Table 4.12: Trowbridge HMA – Emerging Preferred Strategy

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

4.5.10 A summary of the assessment scores is shown in the following table. Detailed assessment matrices are in Annex I. The table below shows average scores[56] against each SA objective, and an overall score[57] for the strategy.

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	Overall score
Emerging Preferred Strategy	-1.6	-1.6	-1.6	-1.4	-1.6	-1.4	-1.2	0.8	1.4	-1.2	1.4	**-8.0**

4.5.11 A summary of the key findings is as follows:

- This emerging preferred strategy for Trowbridge HMA achieves a better overall sustainability score than all of the 'higher growth' and 'lower growth' strategies assessed previously, except LHNA Strategy TR-A which also achieves a score of -8.0.

- This emerging preferred strategy is considered likely to also have significant adverse effects against several of the environmental objectives, particularly at Trowbridge, Warminster and Westbury which have higher levels of growth. However, this assessment has not assessed individual development sites and there may be locations where development could take place in these settlements where such impacts, with mitigation, could be reduced.

- The SA had recommended that the levels of proposed growth at **Warminster** and **Westbury** could be increased and the emerging preferred strategy incorporates that recommendation. At Warminster, the relatively low housing provision in the different strategies was a significant issue that would've effectively tied growth to current levels of commitments and would mean a falloff in provision in the latter years of the plan period. At Westbury, given the relatively unconstrained nature of the town in environmental terms, it was considered that the housing requirement could be increased. The increased provision in this emerging preferred strategy has increased the likely future social and economic benefits in those towns.

- At **Trowbridge**, the proposed housing requirement of 5830 dwellings is a reduction from the higher growth strategies TR-A and TR-C. This takes into account the SA recommendation to reduce the housing requirement at Trowbridge due to environmental constraints, with some re-distribution to Warminster and Westbury. However, the proposed housing requirement is still likely to have significant environmental effects against many of the objectives.

- Given the relatively small reduction in the housing requirement at **Trowbridge**, it remains a **key recommendation** of this SA that more of this growth could be re-distributed to Warminster, Westbury and possibly to rural areas, or to a different HMA. If this is not considered possible, consideration could be given to the following:

  - a focus on delivering brownfield sites in Trowbridge town centre;

  - an assessment of potential available sites that are not adjacent to the Trowbridge town boundary i.e. further away from the town boundary, but that could have less environmental impacts than sites that are closer to the town; and

  - a review of the Green Belt at Trowbridge and Bradford on Avon which could free up certain sites on the edge of the towns that may not significantly affect the openness of the Green Belt.

- The relatively small housing requirement proposed at **Bradford on Avon** of 350 dwellings is considered likely to have minor adverse environmental effects only. The town is very constrained in terms of biodiversity, transport (and subsequent air quality issues) and in landscape terms and the Green Belt considerably limits land available for housing development.

[56] Calculated by adding the scores for each settlement (including 'Rest of HMA') and dividing by the number of settlements
[57] Calculated by adding the scores for each SA objective for each strategy

- However, considering the SA findings of other strategies above for **Bradford on Avon**, this small housing requirement will not help resolve housing affordability issues in the town. The house price to earnings ratio has risen significantly from 9.84 in 2008 to 14.04 in 2017 and this is the highest in the HMA, yet delivery of affordable housing is the lowest. The SA recommends that provision of affordable housing at the town is prioritised to meet identified needs, perhaps through application of a specific affordable housing policy requirement for the town that is higher than for other parts of Wiltshire, subject to viability testing.

- **Bradford on Avon** – given the above, a further recommendation to make more land available might be a review of the Green Belt surrounding the town which could free up certain sites on the edge of the town that would not significantly affect the openness of the Green Belt but would have significant benefits for affordability.

- The assessment of this strategy is based on overall housing numbers in each settlement and the rural area and has not considered individual locations within those places. Those site assessments will be undertaken at a later stage in the plan's preparation, except for sites at Trowbridge which have been assessed as part of this SA.

4.6 Conclusions

4.6.1 The SA has assessed strategies for distributing growth at the four HMAs, both at higher and lower levels of growth, and an emerging preferred strategy, and outlined the likely effects at a settlement and rural area level, together with providing recommendations and possible mitigation measures. This was a 'high-level' assessment based on different distributions without considering potential sites or particular growth areas at settlements. However, the assessment was based on a detailed knowledge of issues being experienced at each settlement and rural area.

4.6.2 For the higher growth (LHNA) strategies for each HMA there may be more significant adverse environmental impacts at certain more constrained settlements e.g. Bradford on Avon, Marlborough and Malmesbury. However, this higher level of growth at those settlements is still at a relatively modest level whereby mitigation measures are likely to be able to sufficiently reduce any adverse effects. And the SA has consistently noted the housing affordability issues at some of these settlements, whereby to allocate lower levels of housing could have significant social and economic impacts for those areas.

4.6.3 The SA has not noted any impacts of such significance that would prevent development at the higher level (LHNA) from coming forward in each HMA. But a number of key recommendations have been made to amend the distribution of growth in some areas that would help reduce the significance of impacts and increase benefits. Those key recommendations are:

1. In Chippenham HMA, to explore an additional/amended development strategy that would reduce proposed development levels in/around the more environmentally constrained settlements of Malmesbury, Corsham and Devizes to the lower levels in Strategy CH-B (or lower). Such a strategy would increase the growth requirement at the less environmentally constrained settlements of Melksham, Calne and Chippenham and in the Rest of the HMA.

2. In Salisbury HMA, i) to reduce growth levels at Salisbury to reduce the likelihood of significant effects and re-distribute to other areas in the HMA, especially to Amesbury and Tidworth/Ludgershall, and ii) to reassess the likely effects of a new settlement when/if further details of a location is known as the assessment has shown likely significant social and economic benefits from such a project.

3. In Swindon HMA, to increase levels of growth at Royal Wootton Bassett and in the Rest of the HMA as they are considered able to accommodate higher levels of growth that could help sustain and provide new services and facilities. Provision of affordable housing at Marlborough should be prioritised to meet identified needs.

4. In Trowbridge HMA, given the significant existing environmental constraints at the Principal Settlement of Trowbridge, it is recommended that a new strategy is formulated that reduces the

housing requirement at Trowbridge and possibly at Bradford on Avon. This could be re-distributed to Warminster, Westbury and possibly to rural areas, or to a different HMA. If this is not considered possible, consideration should be given to the following:

- a focus on delivering brownfield sites in Trowbridge town centre;
- an assessment of potential available sites that are not adjacent to the Trowbridge town boundary but could have less environmental impacts than sites that are closer to the town; and
- a review of the Green Belt at Trowbridge and Bradford on Avon which could free up certain sites on the edge of the towns.

5. In Trowbridge HMA, to prioritise provision of affordable housing at Bradford on Avon to meet identified needs, perhaps through application of a specific affordable housing policy requirement for the town that is higher than for other parts of Wiltshire, subject to viability testing.

4.6.4 The SA findings and recommendations noted above then informed an emerging, preferred strategy for each HMA which were also assessed. The overall conclusions are as follows:

Chippenham HMA

4.6.5 The emerging preferred strategy achieves a better overall sustainability score than the overall scores for each of the other 'higher growth' and 'lower growth' strategies for Chippenham HMA. There are no likely significant adverse effects overall against any of the SA objectives.

Salisbury HMA

4.6.6 The emerging preferred strategy for Salisbury HMA achieves a similar overall sustainability score to 'higher growth' and 'lower growth' strategy SA-A and a significantly better score than strategies SA-C and SA-D. However, 'higher growth' and 'lower growth' strategies for SA-B remain the better performing strategies in sustainability terms. This strategy has no likely significant effects, either positive or negative, against any of the SA objectives.

Swindon HMA

4.6.7 The emerging preferred strategy for Swindon HMA achieves a better overall sustainability score than 'higher growth' and 'lower growth' strategies SW-A and SW-C. However, 'higher growth' and 'lower growth' strategies for SW-B remain the better performing strategies in sustainability terms. This is primarily due to less significant adverse environmental effects at Marlborough as SW-B strategies propose lower levels of growth there. This strategy has no likely significant effects, either positive or negative, against any of the objectives.

Trowbridge HMA

4.6.8 This emerging preferred strategy for Trowbridge HMA achieves a better overall sustainability score than all of the 'higher growth' and 'lower growth' strategies assessed previously, except LHNA Strategy TR-A which also achieves a score of -8.0. This strategy is considered likely to also have significant adverse effects against several of the environmental objectives, particularly at Trowbridge, Warminster and Westbury due to higher levels of growth at those settlements.

5. Assessment of potential development sites at Principal Settlements

5.1 Introduction

5.1.1 This chapter sets out the main sustainability appraisal (SA) findings of the assessment of 'reasonable alternative' potential development sites at the three Wiltshire Principal Settlements of Chippenham, Salisbury and Trowbridge. The assessment of 'reasonable alternative' potential development sites at the Market Towns will be included in a future iteration of the SA Report as they do not form part of the current consultation.

5.1.2 A site selection process has been undertaken to select the 'reasonable alternative' potential development sites at the Principal Settlements for further assessment through the SA. A summary of the site selection process is shown in Figure 2.1 in Section 2.

5.1.3 Figure 2.1 shows the stages involved to decide which sites should be considered 'reasonable alternatives.' This SA stage is shown as Stage 3 in Figure 2.1. The findings of stages 1 and 2 for the Principal Settlements are documented in separate site selection papers for each settlement.

5.1.4 The sections that follow include a map of the potential development sites assessed in each settlement, a summary table of the overall assessment scores for the sites and a brief summary of the likely significant effects and possible mitigation measures for each site. The assessment has been undertaken as described in Chapter 2 (Methodology) of this report. The detailed site assessment matrices can be found in Annex II.

5.2 Chippenham Principal Settlement

5.2.1 The site selection process (stages 1 and 2 in Figure 2.1) has informed the selection of 7 sites for further assessment through the SA. The separate Chippenham 'site selection report' should be referred to for further information as to how these sites were chosen for further assessment through the SA. The sites are shown on the following map:

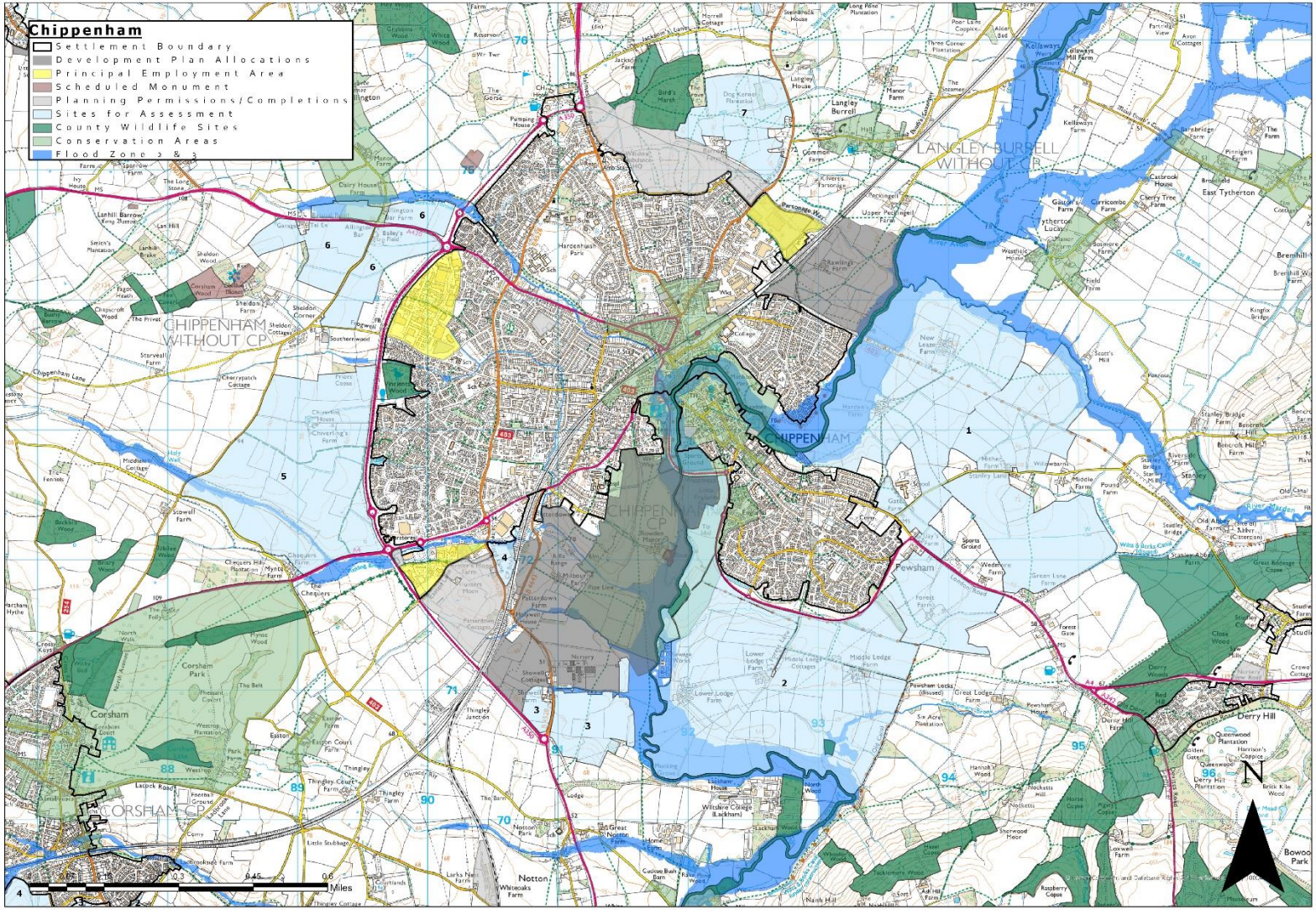


Figure 5.1: 'Reasonable alternative' development sites at Chippenham

5.2.2 The sites, corresponding SHELAA references, size and approximate range of dwellings are shown in Table 5.1:

Table 5.1: 'Reasonable alternative' development sites at Chippenham

Site	SHELAA ref(s)	Site size (Ha)	Approx. range (No. of dwellings)
1	455, 506b, 3092, 458, 3354	243.98	6100 - 8539
2	494, 809, 456, 3234	249.27	6232 - 8724
3	473, 808, 726994, 454a	36.77	919 - 1287
4	803	3.93	98 - 138
5	3666	142.9	3572 - 5001
6	467, 468, 497	67.85	1696 - 2375
7	744	43.46	1086 - 1521

5.2.3 The SA has identified the likely effects of developing these sites against a range of sustainability criteria. Table 5.2 presents the assessment scores and overall performance of each site. Sites are presented in order of sustainability performance in Table 5.2 with the more sustainable sites towards the top and less sustainable sites towards the bottom. This assessment has informed the selection of preferred options by the Council.

Table 5.2: Summary of the assessment of Chippenham sites (in order of sustainability performance)

SITE	Sustainability performance (MORE → LESS)	Overall site score (+ position)	SA obj 1 (Biodiversity) overall score	SA obj 2 (Land + soil) overall score	SA obj 3 (Water) overall score	SA obj 4 (Air/poll'n) overall score	SA obj 5 (Climate) overall score	SA obj 6 (Energy) overall score	SA obj 7 (Heritage) overall score	SA obj 8 (Landscape) overall score	SA obj 9 (Housing) overall score	SA obj 10 (Inc comms) overall score	SA obj 11 (Transport) overall score	SA obj 12 (Economic) overall score
Site 1	MORE SUSTAINABLE ↑ ↓ LESS SUSTAINABLE	- 2 (1st)	-	--	-	--	-	+	--	-	+++	+++	--	+++
Site 4		- 3 (2nd)	-	-	--	-	-	+	-	0	++	+	-	+
Site 6		- 4 (3rd)	-	--	--	--	-	++	--	-	+++	++	--	++
Site 2		- 5 (joint 4th)	--	--	-	--	-	+	--	--	+++	++	--	+++
Site 3		- 5 (joint 4th)	-	--	-	--	--	++	--	-	+++	+	--	++
Site 7		- 5 (joint 4th)	--	--	-	--	--	++	--	--	+++	+++	--	++
Site 5		- 6 (7th)	-	--	--	--	-	+	--	--	+++	++	--	++

Key to likely significance of effects:

+++	Major positive effect = +3 points
++	Moderate positive effect = +2 points
+	Minor positive effect = +1 point
0	Neutral effect = 0 points
-	Minor adverse effect = -1 point
--	Moderate adverse effect = -2 points
---	Major adverse effect = -3 points

General mitigation measures relevant to all sites at Chippenham

5.2.4 There are some mitigation measures that are relevant to all sites that could help to minimise the level of adverse effects and increase the sustainability benefits, and these will not be listed below against individual sites. This list is not exhaustive. Measures include the following:

- A minimum of 10% net gain for biodiversity within individual sites and overall layout and design should ensure that habitat creation provides connectivity to adjacent or nearby habitat areas
- A priority area for biodiversity sensitivity in Chippenham is the River Avon County Wildlife Site (CWS) which affects several sites. There is potential for significant adverse effects on water quality and disturbance of wildlife using the riparian corridor (including a number of European Protected Species)
- Development should maximise the efficient use of land and use of previously developed land
- The availability of a range of reliable and accessible sustainable transport, including active travel, options is required to help avoid significant impacts on local air quality, allow travel for those without their own vehicle and to increase levels of exercise and wellbeing
- Plans for developing each site should take a proactive approach to mitigating and adapting to climate change through the design and layout of the site, ensuring high levels of energy efficiency in all new buildings, through mixed-use development that can reduce the need to travel and by ensuring as much choice and access as possible to efficient and reliable sustainable modes of transport
- Consideration to the inclusion of Sustainable Drainage Systems (SuDS) to control the risk of surface water flooding from impermeable surfaces and improve biodiversity
- Archaeological assets can be found on many sites. Mitigation could include avoidance of high value archaeological remains across sites where preservation in situ is likely to be required. Mitigation strategies could include preservation and future management strategies

5.2.5 The likely impacts and mitigation measures listed below under each individual site are some of the significant issues that will need to be considered but this is not an exhaustive list. Further measures are included in the individual site assessments in Annex II and if development is proposed on any site, more detailed assessments of impacts and mitigation will need to be undertaken.

Chippenham Site 1 (SHELAA sites 455, 506b, 3092, 458, 3354)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- Site 1 is considered the most sustainable site when assessed against the 12 SA objectives and when compared against all other sites
- **Land/soil:** given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality
- **Water resources:** the site is covered by an extension to Source Protection Zone 2 meaning there is a 400-day travel time from pollutant to source
- **Environmental pollution:** the scale of development likely on a site of this size will inevitably significantly increase levels of environmental pollution, including on air quality, noise, light and vibration. The site contains several working farms with other possible associated commercial activity - as such there is potential for both noise and odour from these sources
- **Climate change:** development of this significant sized site has the potential to significantly increase greenhouse gas emissions due to emissions generated through the construction and occupation of the development
- **Heritage:** development of this site has the potential to impact on a range of designated and non-designated assets. The range of potential impacts is significant and will require further, more detailed assessment

- **Housing:** likely major benefits in terms of provision of significant amount of affordable housing and wide variety of mix, type and tenure
- **Inclusion:** likely major benefits in terms of affordable housing provision alongside employment, community facilities, public open space, amenity greenspace, schools and healthcare
- **Education:** there is no capacity to accommodate these places within existing schools. Abbeyfield secondary school is well connected to this site, but there is no existing capacity to accommodate development beyond that already planned. To accommodate the upper end of the range of dwellings, 6 2FE primary schools on sites of at least 2ha would be required and a new 9FE secondary school alongside post-16 provision.
- **Transport:** the scale of development would produce a likely significant impact on the local highway network, which cannot currently be accommodated. Would require delivery of significant road infrastructure to link with strategic allocation to the north and A4 to the south
- **Economy:** major benefits for local economy through housing, employment, short-term construction jobs, increased local workforce, potential energy generation, new services and facilities, new road infrastructure. The site is also within approximately 1km of Langley Park Industrial Estate to the north-west
- Minor or neutral effects are likely for biodiversity, water resources, climate change, energy, landscapes

Summary of key mitigation measures:

- **Water resources:** as this site is within a Source Protection Zone, the extent to which SuDS can be used may be affected
- **Environmental pollution:** river corridors on the edges of this site will need to be protected from noise and light pollution by leaving wide, dark, undeveloped buffer zones to benefit wildlife
- **Climate change:** this site could include significant renewable energy generation, both within buildings and in areas of open space. Low carbon community infrastructure such as district heating could also be incorporated
- **Heritage:** more detailed assessment will be required. Mitigation for impacts on the various assets in terms of buffers is not contiguous and is therefore likely to result in a reduction in capacity across the site
- **Landscape:** mitigation to include limiting development in close proximity to the River Avon and River Marden corridors to retain a strong landscape buffer to the settlement edge. Retain the character and separate identity of the rural settlements to the north and east of the site and the rural character of Stanley Lane. Avoid development that would preclude the restoration of the Wilts & Berks Canal (impact upon its protected route)
- **Transport:** site specific mitigation measures include; on-site employment, health, retail and education facilities to reduce out-commuting; bus service provision, internal bus priority (including bus only routes); completion of Rail Station capacity enhancements; A4 capacity enhancements; and delivery of an eastern relief road
- **Education:** to accommodate the upper end of the range of dwellings on this site, 6 2FE primary schools on sites of at least 2ha would be required; these would need to accommodate a 60-place nursery. Additionally, 7 100-place full day care nurseries or smaller provisions would be necessary. A new 9FE secondary school would be required to support this site alongside post-16 provision

Chippenham Site 4 (SHELAA site 803)

Summary of likely significant issues:

- This is a relatively small site – there are few constraints and mostly minor effects are likely. No major adverse effects (where mitigation is considered unachievable) are likely
- **Biodiversity:** Pudding brook (a minor watercourse) runs through the north of the site and the railway line abuts the eastern edge of the site. Both these features have significant function for biodiversity as commuting and foraging corridors between other habitat areas in the wider landscape
- **Water resources:** the site is entirely within Groundwater Source Protection Zone 2
- Minor or neutral effects are likely for biodiversity, land and soil, environmental pollution, climate change, energy, heritage, landscapes, inclusion, transport and economy

Summary of key mitigation measures

- **Biodiversity:** A significant buffer strip for both the Pudding Brook watercourse and the railway corridor will be required which may seriously reduce the developable area within this site
- **Water resources:** given its location within Groundwater Source Protection Zone 2, development would need to make necessary provision to protect from harm or pollution to any ground, surface or drinking water

Chippenham Site 6 (SHELAA sites 467, 468, 497)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- **Land/soil:** given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality. It is considered that delivering appropriate densities on this site would be problematic given its location west of the A350 where there is no other urban development and with likely significant amount of landscaping required
- **Water resources:** the site is covered entirely by Source Protection Zone 2
- **Environmental pollution:** the scale of development likely on a site of this size will inevitably significantly increase levels of environmental pollution, including on air quality, noise, light and vibration. Its location means it is likely to be more car dependant than other sites closer to Chippenham and there are likely greater effects of light pollution on surrounding rural areas
- **Energy:** the site could support some energy generation from renewable and low carbon sources, but it is also smaller than some other sites such that significant investment in the grid would not be required
- **Heritage:** likely significant impacts on the rural identity of Allington and Allington Conservation Area and on the highly designated group of buildings at Sheldon Manor
- **Housing:** likely major benefits in terms of provision of significant amount of affordable housing and wide variety of mix, type and tenure
- **Inclusion:** significant social benefits likely but not major as site is in a less deprived area and therefore likely to be less benefits overall
- **Education:** in meeting the upper end of these needs, it is likely that two 2FE primary schools on sites of at least 2ha would be required within the development and a new secondary school is likely to be required at the town
- **Transport:** the site would be accessible from the A350 and A420 giving good access to motorised transport, but it is on the western side of the A350 resulting in significant severance for pedestrian, cyclist and railway mode shares
- **Economy:** this site could provide new housing, including affordable housing, employment and associated infrastructure that will help support the local economy and economic growth, including new highway infrastructure. It is very well related to the A350 and the A420 and could help support nearby Bumpers Farm Industrial Estate
- Minor or neutral effects are likely for biodiversity, climate change and landscapes

Summary of key mitigation measures:

- **Land/soil:** development density will be influenced by the size of the site and the significant degree of landscape mitigation which would likely be required. The site is separated from the rest of the urban area by the A350 and mitigation measures would be difficult to prevent the appearance of an extension into open countryside
- **Water resources:** given its location within Groundwater Source Protection Zone 2, development would need to make necessary provision to protect from harm or pollution to any ground, surface or drinking water
- **Highways:** this site does already have potential access to the A350 and A420 so some large-scale highway infrastructure may not be necessary
- **Environmental pollution:** the location of Chippenham Rugby Club means that only the north-east part of the site is adjacent to the urban area and this is likely to have a greater adverse effect on the countryside to the west from light pollution. Mitigation measures could include locating higher density development towards the east/north-east of the site, nearer to the urban area, with lower density development located to the west, north and south of the site. Levels of light pollution could be minimised through sensitive design and layout

- **Heritage:** very careful consideration of the location and design of any future development would be needed to avoid significant harm to Allington and the Sheldon Manor group which is a highly designated complex of heritage assets
- **Landscapes:** development in the south and west of the site should be limited and a strategic countryside gap maintained to the north to protect the separate identity of Allington
- **Transport:** the significant size of this site would suggest that a mixed-use development involving residential, health, education, employment and other uses could be achieved that may help reduce the need to travel, reduce out-commuting and reduce impacts on existing roads. However, development on this scale is likely to significantly increase pressures on the local road network. The site would be accessible from the A350 and A420 giving good access to motorised transport, but it is on the western side of the A350 resulting in significant severance for pedestrian, cyclist and railway mode shares.
- **Education:** it is likely that two 2FE primary schools on sites of at least 2ha would be required within the development; these would each be able to support a 60-place nursery. Additionally, two 80-100 place full day care nurseries or smaller provisions would be required to meet early years' needs. In terms of secondary schooling a new secondary school is likely to be required at the town to support the proposed level of growth.

Chippenham Site 2 (SHELAA sites 494, 809, 456, 3234)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- **Biodiversity:** priority areas of biodiversity sensitivity are the River Avon CWS and Cocklemore Brook, Lackham Wood CWS (to immediate south of site) and remnants of the Wilts & Berks Canal route along the eastern edge of the site
- **Land/soil:** likely significant adverse effects given the significant size of site and likely scale of loss of greenfield, agricultural land of medium quality, and likely mineral sterilisation that would occur
- **Environmental pollution:** scale of likely development will inevitably significantly increase levels of environmental pollution. Impacts on local air quality are most likely to arise from a significant increase in vehicle usage on existing roads and from any new highway infrastructure needed to serve the development. The site is in proximity to working farms and Sewage Treatment Works which could be sources of odour
- **Heritage:** likely significant impacts on Rowden Conservation Area, Lackham House and its designed landscape and setting of Grade II and II* listed buildings and scheduled moated site at Rowden Manor
- **Landscapes:** there is a strong sense of separation from the existing urban area created by the network of mature woodland, riparian vegetation and field boundary hedgerows. The features contribute to the moderate scenic quality particularly associated with the river corridor
- **Housing:** likely major benefits in terms of provision of significant amount of affordable housing and wide variety of mix, type and tenure
- **Education:** there is no additional capacity at existing schools due to planned development. There would be a requirement for seven new 2FE primary schools on sites of at least 2ha. Additionally, at the higher end of the range would require a new 9FE secondary school, alongside post 16 provision
- **Transport:** a significant amount of new road and sustainable transport infrastructure will be required. Site of this size would need access to two different road networks. Limited opportunity to tie into infrastructure delivered with the Rowden Park development due to landscape and flood zone buffers. Would require access to A350 in west via Site 3.
- **Economy:** Major benefits for local economy through housing, employment, short-term construction jobs, increased local workforce, possible energy generation, new services and facilities, new road infrastructure
- Minor or neutral effects are likely for water resources, climate change and energy

Summary of key mitigation measures:

- **Biodiversity:** significant buffers adjacent to both sides of all watercourses and to the protected route of the former canal. Any development should aim to retain and enhance all hedgerows and treelines, and to create habitat areas that connect existing habitat, especially woodland and riparian areas

- **Land/soil:** the loss of agricultural land would not be possible to mitigate. The sterilisation of mineral resources could be overcome through mitigation, such as extraction of mineral prior to development. However, such a loss would need to be considered against the potential benefits of developing the site
- **Environmental pollution:** the availability of a range of reliable and accessible sustainable transport options will be required to help avoid significant impacts on local air quality
- **Environmental pollution:** there will need to be adequate physical separation of residential areas and the farms/commercial areas and the sewage treatment works
- **Environmental pollution:** The River Avon corridor to the west and south of this site will need to be protected from noise and light pollution by leaving wide, dark undeveloped buffer zones that will benefit wildlife
- **Heritage:** a mitigation strategy may involve leaving substantial parts of the site undeveloped to avoid harm to the settings of various historic assets and to areas of highly sensitive surviving historic landscape character
- **Landscapes:** there is a strong sense of separation from the existing urban area. Development should be avoided in close proximity to the River Avon to retain a strong landscape buffer and as part of the wooded landscape setting to Rowden Manor in the west and Lackham House to the south; avoid development that would preclude the restoration of the Wilts and Berks Canal (impact upon its protected route) and create a multi-functional green corridor between Pewsham and the site (along South of Pewsham Way), incorporating the existing wooded settlement edge and contributing to an appropriate transition and linking landscape between settlement areas
- **Transport:** the site size means that much of its accessibility demands will need to be delivered within its own confines and on-site employment, health, retail, education and other facilities would be required to help reduce out-commuting and reduce impacts on existing roads. The site requires access to two or more different road networks providing distribution to different geographical areas to accommodate generated traffic capacity
- **Transport:** there is limited opportunity to tie into infrastructure delivered with the Rowden Park development due to landscape and flood zone buffers. To provide an access onto a further road network in the west, being the B4528 leading to the A350, then the site would rely upon the south eastern section of site 3 to provide the additional link

Chippenham Site 3 (SHELAA sites 473, 808, 726994, 454a)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- **Biodiversity:** the Bristol Avon River CWS runs along the eastern boundary of the site and the railway corridor runs along the western edge. Both corridors provide commuting and foraging for a range of wildlife species and connectivity between different areas of habitat in the wider landscape
- **Land/soil:** this is a medium-sized site consisting of roughly equal amounts of Grades 1, 2, 3 and 4 BMV agricultural land. Development of this site would likely lead to a significant loss of the highest quality agricultural land
- **Land/soil:** the eastern third part of the site lies within the Bristol Avon sand and gravel Mineral Safeguarding Area - the potential resource would likely be substantially sterilised
- **Environmental pollution:** this site extends out into open countryside south of Chippenham. The scale of development likely on a site of this size will inevitably significantly increase levels of environmental pollution, including on air quality, noise, light and vibration
- **Environmental pollution:** Impacts on local air quality are most likely to arise from a significant increase in vehicle usage on existing roads and from any new highway infrastructure needed to serve the development
- **Environmental pollution:** the site is also close to sewage treatment works so there may be odour implications which will need to be investigated by the developer
- **Climate change:** areas of significant and moderate fluvial flood risk are associated with the River Avon to the east of the site and flood risk could be exacerbated by climate change. Although development could avoid this area and avoid risk, it may worsen the risk elsewhere
- **Heritage:** there are likely significant impacts on the Grade II listed Showell Farm and farm buildings (some individually listed) and the approach to the Grade II Lackham country house and

Grade II lodge. The site has various features of medium/high archaeological value associated with a Roman settlement

- **Housing:** Likely major benefits in terms of provision of significant amount of affordable housing and wide variety of mix, type and tenure
- **Education:** there is no additional capacity identified at existing schools due to planned development. It is likely that this site would require on site provision of one 2FE primary school on a site of at least 2ha and financial contributions towards the expansion of an existing secondary school or to supply places in a new school
- **Transport:** the site would likely be considered separated and 'satellite' to the town. It is a considerable distance from Chippenham town centre. There is good access to the A350 but given the location, development would be likely to be car dominated
- **Economy:** the site has good accessibility via the A350 and B4528 suggesting that the site would be able to support existing employment land to the south-west of Chippenham, but it is less likely to be able to support new onsite employment land alongside housing
- Minor or neutral effects are likely for biodiversity, water resources, landscapes and inclusion

Summary of key mitigation measures:

- **Biodiversity:** significant buffer zones for all watercourses and the railway line would be required. This may significantly reduce the capacity of the site**.** There are opportunities to connect the railway corridor to the river corridor by planting a continuous east-west area or by block planting, providing stepping stones
- **Land/soil:** where possible, any development on this site should be located to reduce the loss of BMV, with development of lower quality land instead
- **Land/soil:** for the expected loss of the mineral resource, mitigation could include extraction of mineral prior to development
- **Environmental pollution:** the presence of the Sewage Treatment Works means a buffer zone may be required
- **Environmental pollution:** the site contains a working farm and nurseries and developers will need to carry out appropriate assessments to determine whether any impacts are significant
- **Environmental pollution:** new transport infrastructure will be needed, which is likely to increase levels of noise, light and vibration. However, this site already has potential access to the A350 so some large-scale highway infrastructure may not be necessary and the A350 will also already impact on this area somewhat in terms of noise and light pollution
- **Climate change:** there is a significant risk posed to 40% of the site due to high groundwater levels. High groundwater levels could impact infiltration techniques, drainage, construction activities and flood risk. There is also significant flood risk associated with both fluvial and pluvial surface water flooding, which is exacerbated by climate change. Vulnerability could be minimised using flood defences and buffer zones
- **Heritage:** Low density/low overall numbers are likely to be required to meet the need to avoid an urbanising impact on the approach to Lackham Estate (a country house in a designed landscape) and to reduce potential impacts on the Grade II listed Showell Farm and its individually listed farm buildings
- **Education:** it is likely that this site would require on site provision of one 2FE primary school on a site of at least 2ha with 60-place nursery, while a full day care nursery of up to 100 places would be required to meet additional early years needs
- **Transport:** the site is considered a considerable distance from Chippenham town centre and will have little opportunity to access infrastructure in surrounding development. The development would be likely to be considered car dominated. However, with potentially good access to the A350 as proposed as part of the Showell Farm development and with the suggested range of dwellings to be accommodated on site, it would require relatively limited mitigation
- **Economy:** this site has good accessibility via the A350 and B4528, suggesting that the site would be able to support existing employment land to the south-west of Chippenham

Chippenham Site 7 (SHELAA site 744)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- **Biodiversity:** Birds Marsh Wood CWS is adjacent to the site. The landscape extending eastwards from Birds Marsh Wood includes wood pasture and neutral grassland, a high density

of ponds, copses, mature trees, small watercourses and a network of mature hedgerows, and is known to support populations of protected species, including Great Crested Newt, and Lesser and Greater Horseshoe Bats. This area is significant and is likely to be particularly sensitive to change

- **Land/ soil:** it is considered that delivering appropriate densities could be problematic given its location in such close proximity to Birds Marsh Wood and extending out into open countryside to the north and east towards Langley Burrell
- **Land/ soil:** evidence shows that most of this site consists of Grade 2 BMV agricultural land. Development of this large site would therefore lead to a significant loss of higher quality agricultural land
- **Environmental pollution:** significant air quality impacts likely in an environmentally sensitive location and significant impacts likely on Birds Marsh Wood from noise and light pollution
- **Climate change:** this is a smaller site which should produce fewer emissions, but the entire site is identified as having a moderate risk due to high groundwater levels. High groundwater levels could impact on infiltration techniques, drainage, construction activities and flood risk, therefore site-specific groundwater investigations will be required
- **Heritage:** there are likely significant impacts on Grade II Barrow Farmhouse, Barrow farm Cottages, Pound House and Old School House, also Grade II* Langley House and Grade I Church of St Peter. Indirect impacts on Langley Burrell CA and Kington Langley CA. The cumulative impact in combination with the previously approved application N/12/00560/OUT would be severe
- **Landscapes:** the site has a predominantly rural character. The pattern of vegetation creates a wooded approach to Chippenham from the north that contributes to a strong sense of separation between Chippenham and outlying rural settlements of Kington Langley and Langley Burrell. There is potential for built form to be intrusive in the rural landscape setting where it breaks wooded skylines and extends the urban edge, reducing separation between Chippenham, outlying rural settlements and Bird's Marsh Wood
- **Education:** it is likely that in meeting the upper end of these needs a new primary school would be required on a site of at least 2ha. Financial contributions would be required to support off-site provision of secondary schooling
- **Transport:** development would be reliant upon the delivery of the adjacent development site to the south, its associated link road between Malmesbury Road roundabout (A350) and Mauds Heath Causeway and the extended HIF Relief Road. There are significant concerns around the capability of the Malmesbury Road Roundabout improvements to accommodate additional development
- Minor or neutral effects are likely for water resources

Summary of key mitigation measures:

- **Biodiversity:** mitigation measures will include suitable buffers around sensitive areas such as Birds Marsh Wood, ponds, priority habitat and smaller woodlands. These buffer areas should be connected by newly created habitat wherever possible
- **Land/ soil:** development density will be influenced by the size of the site and the significant degree of landscape mitigation which would likely be required. Development would also need to take account of the settings of various listed buildings to the east and south of the site. Density of development may need to be lower than for other sites to take these factors into account
- **Land/ soil:** to reduce the loss of higher quality agricultural land, where possible, any development on this site should be located to reduce the loss of BMV, with development of lower quality land instead
- **Environmental pollution:** mitigation measures could include locating higher density development towards the south of the site which is adjacent to the existing CSAP strategic allocation, with lower density development located to the west, north and east of the site. Birds Marsh Wood, in particular, should be protected from noise and light pollution by leaving a wide, dark undeveloped buffer zone between the wood and any new development
- **Climate change:** to mitigate potential flood risks a detailed Flood Risk Assessment and Surface Water Drainage Strategy would be required to identify and mitigate flood risk and to ensure flood risk isn't exacerbated elsewhere. Further detailed modelling work (SFRA Level 2) may also be required

- **Heritage:** any mitigation measures are likely to be very difficult as development would affect the settings of so many listed buildings and the separate rural identity of Langton Burrell and Kington St Michael. A significant reduction in dwellings and careful consideration of site design and layout would be needed after further assessment
- **Landscapes:** limit development in the north and east of the site. Retain hedgerows, trees and woodland as part of a mature landscape framework; ensuring appropriate buffers to development, commensurate with the veteran status of the many mature field boundary oaks, Bird's Marsh Wood and other smaller areas of woodland present in this area
- **Transport:** mitigation will require land beyond the development site. The proposed development is reliant upon the delivery of the adjacent development site to the south and its associated link road between Malmesbury Road roundabout (A350) and Mauds Heath Causeway. It would need to be ensured that there is sufficient junction capacity on the Malmesbury Road Roundabout and Mauds Heath Causeway

Chippenham Site 5 (SHELAA site 3666)

Summary of likely significant issues:

- Site 5 is considered the least sustainable site when assessed against the 12 SA objectives and when compared against all other sites, however, no major adverse effects (where mitigation is considered unachievable) are likely
- **Land/soil:** likely significant scale of loss of medium quality agricultural land, and likely issues delivering appropriate densities in a location west of the A350, extending out into open countryside, where there is no other development
- **Water resources:** moderate adverse effects given the increased demand on water resources and that the site is entirely covered by Source Protection Zone 2
- **Environmental pollution:** scale of development on a site of this size will inevitably significantly increase levels of environmental pollution. Likely to significantly increase pressures on the local road network through proximity to A350 and A4. May result in significant severance for pedestrian, cyclist and railway mode shares whilst increasing car related air pollution
- **Heritage:** likely significant impacts on Grade II listed farmhouses and farmsteads (Chiverlins Farm, Mynte Farm and buildings, Chequers Farm) and impacts on Corsham Grade II* RPG
- **Landscapes:** there is a strong sense of separation from the urban area due to the enclosed field pattern, linear and riparian woodland, and robust roadside buffer along the eastern side of the A350. The site is of generally medium-high landscape sensitivity to housing development, with areas of higher sensitivity on rising, open land to the west of the site and to the southwest overlooking the A4 towards elevated areas of Corsham Court's designed parkland
- **Housing:** likely major benefits in terms of provision of significant amount of affordable housing and wide variety of mix, type and tenure
- **Inclusion:** significant benefits for reducing social inclusion but site is not located within an area subject to high levels of deprivation
- **Education:** at the higher end of the range of dwellings four 2FE primary schools would be required on sites of at least 2ha. In meeting the need of secondary school places, a new school is likely to be required. A new on-site secondary school is unlikely to be well connected to the existing settlement due to the situation of the A350 on the eastern site boundary. Alternatively, financial contributions could be sought to support additional places at a new school in the town
- **Transport:** development on this scale is considered likely to significantly increase pressures on the local road network. The site would be very accessible from the A350 and A4 giving good access to motorised transport, but it is on the western side of the A350 resulting in significant severance for pedestrian, cyclist and railway mode shares
- **Economy:** moderate positive effects – opportunity to incorporate a mix of uses on this site. Capable of helping support existing employment areas, such as Methuen Park and Bath Road Industrial Estate
- Minor or neutral effects are likely for biodiversity, climate change and energy

Summary of key mitigation measures:

- **Land/soil:** Development density will be influenced by the size of the site and the significant degree of landscape mitigation which will likely be required due to the site's size and location

extending out into open countryside. Density of development is likely to be lower than for other sites to take these factors into account

- **Water resources:** Consultation with the Environment Agency could be required to determine the likely effects of development within the areas identified within the Source Protection Zones. Development of this site will need to make suitable provision to protect and, where appropriate, improve local surface, ground and potable drinking water quality
- **Environmental pollution:** mitigation measures could include locating higher density development towards the east of the site, nearer to the urban area, with lower density development located to the west, north and south of the site. Levels of light pollution could be minimised through sensitive design and layout and significant areas of landscaping throughout the site
- **Heritage:** development could have a severe impact on the setting of Chiverlins (formerly Cheverden) Farm possibly leading to complete loss of its agricultural setting, and the southern section would impact on the intact Mynte Farmstead group and Chequers Farm. The south of the site has likely impacts on the setting of high status Corsham Court RPG and approach. Further assessment of the contribution of the whole area to significance would be required.
- **Landscapes:** maintain the rural separation between Chippenham and Corsham Park. Limit development of the south of the site to conserve the rural landscape setting of Corsham Park and avoid development on higher landform where it would be prominent in the wider landscape
- **Transport:** the significant size of this site would suggest that a mixed-use development involving residential, health, education, employment and other uses could be achieved that may help reduce the need to travel, reduce out-commuting and reduce impacts on existing roads. Site specific mitigation measures include: a 4th arm access from existing roundabout; new access from A4; accommodation of dualling of A350; and bus service provision

5.3 Salisbury Principal Settlement

5.3.1 The site selection process (stages 1 and 2 in Figure 2.1) has informed the selection of 8 sites for further assessment through the SA. The separate Salisbury ‘site selection report’ should be referred to for further information as to how these sites were chosen for further assessment through the SA. The 8 sites are shown on the following map:

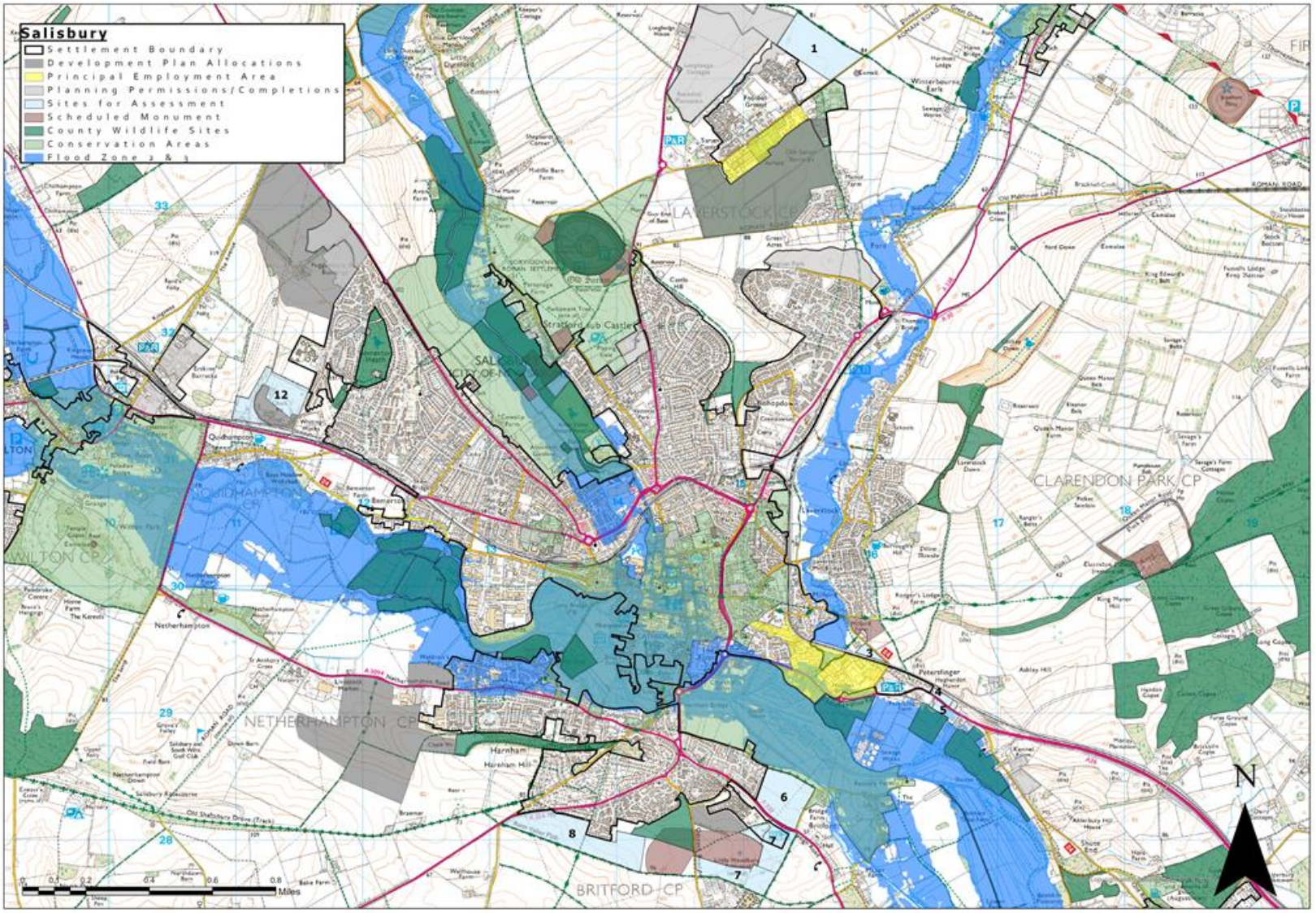


Figure 5.2: 'Reasonable alternative' development sites at Salisbury

5.3.2 The sites, corresponding SHELAA references, size and approximate range of dwellings are shown in Table 5.3:

Table 5.3: 'Reasonable alternative' development sites at Salisbury

Site	SHELAA ref(s)	Site size (Ha)	Approx. range (No. of dwellings)
1	S80	16.95	424 - 593
3	3554b	1.21	30 - 42
4	S193, S97	1.33	33 - 46
5	S189	1.6	40 - 56
6	S159	13.53	338 - 474
7	3422, OM009, 3641, 3423, 3521	14.25	356 - 499
8	3421	22.0	550 - 770
12	S253	12.72	318 - 445

5.3.3 The SA has identified the likely effects of developing these sites against a range of sustainability criteria and Table 5.4 presents the assessment scores and overall performance of each site. Sites are presented in order of performance in Table 5.4 with the more sustainable sites towards the top and less sustainable sites towards the bottom. This assessment has informed the selection of preferred options by the Council (stage 4 in Figure 2.1).

Table 5.4: Summary of the assessment of Salisbury sites (in order of sustainability performance)

SITE	Sustainability performance (MORE → LESS)	Overall site score (+ position)	SA obj 1 (Biodiversity) overall score	SA obj 2 (Land + soil) overall score	SA obj 3 (Water) overall score	SA obj 4 (Air/poll'n) overall score	SA obj 5 (Climate) overall score	SA obj 6 (Energy) overall score	SA obj 7 (Heritage) overall score	SA obj 8 (Landscape) overall score	SA obj 9 (Housing) overall score	SA obj 10 (Inc comms) overall score	SA obj 11 (Transport) overall score	SA obj 12 (Economic) overall score
Site 1	MORE SUSTAINABLE ↑	-1 (1st)	-	-	--	--	-	++	-	-	+++	++	-	++
Site 7		-2 (2nd)	-	--	--	--	-	++	--	-	+++	+++	--	+++
Site 6		-3 (3rd)	-	--	--	--	-	++	--	--	+++	+++	--	+++
Site 8		-5 (4th)	-	--	-	--	-	++	--	-	++	++	--	+
Site 5		-6 (5th)	-	0	--	-	-	+	0	0	+	+	---	-
Site 3	↓	-7 (6th)	-	-	-	--	-	+	-	-	+	+	---	+
Site 12	LESS SUSTAINABLE	-10 (7th)	---	--	--	--	-	++	-	-	+	+	---	+
Site 4		-11 (8th)	--	-	--	--	-	+	0	-	0	0	---	0

Key to likely significance of effects:

+++	Major positive effect = +3 points
++	Moderate positive effect = +2 points
+	Minor positive effect = +1 point
0	Neutral effect = 0 points
-	Minor adverse effect = -1 point
--	Moderate adverse effect = -2 points
---	Major adverse effect = -3 points

General mitigation measures relevant to all sites at Salisbury

5.3.4 There are some mitigation measures that are relevant to all sites that could help to minimise the level of adverse effects and increase the sustainability benefits, and these will not be listed below against individual sites. This list is not exhaustive. Measures include the following:

- A minimum of 10% net gain for biodiversity within individual sites and overall layout and design should ensure that habitat creation provides connectivity to adjacent or nearby habitat areas
- The strategic HRA issues for the River Avon, New Forest and Salisbury Plain apply to many of the sites. Mitigation strategies are required for the River Avon SAC (Phosphate) and New Forest SPA (recreational pressure). Also, the mitigation strategy for Salisbury Plain SPA needs to be reviewed in light of latest monitoring
- Development should maximise the efficient use of land and use of previously developed land
- The availability of a range of reliable and accessible sustainable transport, including active travel, options is required to help avoid significant impacts on local air quality, allow travel for those without their own vehicle and to increase levels of exercise and wellbeing
- Salisbury has three Air Quality Management Areas (AQMAs) in respect of the nitrogen dioxide annual mean objective. Exceedances exist on A36, A30 and at several hotspots in the city centre. Significant traffic management measures are needed to remove levels of traffic from the A36 in particular. CIL/S106 contributions will be required to enable the council to take actions to enable the revocation of the AQMAs
- Plans for developing each site should take a proactive approach to mitigating and adapting to climate change through the design and layout of the site, ensuring high levels of energy efficiency in all new buildings, through mixed-use development that can reduce the need to travel and by ensuring as much choice and access as possible to efficient and reliable sustainable modes of transport
- Consideration of the inclusion of Sustainable Drainage Systems (SuDS) to control the risk of surface water flooding from impermeable surfaces and improve biodiversity
- Archaeological assets can be found on many sites at Salisbury. Mitigation could include avoidance of high value archaeological remains across sites where preservation in situ is likely to be required. Mitigation strategies could include preservation and future management strategies
- Specific consideration should be given to a sites' impact on the setting of Salisbury medieval city and any views to/from the cathedral spire

5.3.5 The likely impacts and mitigation measures listed below under each individual site are some of the significant issues that will need to be considered but this is not an exhaustive list. Further measures are included in the individual site assessments in Annex II and if development is proposed on any site, more detailed assessments of impacts and mitigation will need to be undertaken.

Salisbury Site 1 (SHELAA site S80)

Summary of likely significant issues:

- Site 1 is considered the most sustainable site when assessed against the 12 SA objectives and when compared against all other sites at Salisbury
- No major adverse effects (where mitigation is considered unachievable) are likely
- **Water resources:** Source Protection Zone 2 covers approximately 40% of this site and it is covered by a Drinking Water Protected Safeguard Zone - these are established around public water supplies where additional pollution control measures are needed
- **Environmental pollution: t**his site extends out into open countryside away from existing development at Old Sarum, towards Monarch's Way. Development of this site will enlarge a

detached settlement with poor connectivity with/to Salisbury. It will increase car dependency and add to congestion on Castle Road and within city AQMAs/ A36

- **Energy:** there are opportunities for a site of this size to support energy generation from renewable and low carbon sources and create economic and employment opportunities in sustainable green technologies
- **Housing:** this site is capable of bringing forward a significant proportion of affordable housing as part of any housing development. The size of the site means that it would be likely to support a wide range of house types and sizes to meet different needs
- **Inclusion:** this site is poorly connected to the city centre, but there are some existing public transport links in proximity to the site. Overall, there could be significant social and economic benefits for the Salisbury area through housing provision, short-term construction jobs and a larger workforce for local businesses
- **Education:** primary provision could be incorporated into the new school on the Longhedge development, but this is likely to require a larger primary school and would be unable to incorporate early years provision. The site falls into the secondary school catchment for the Laverstock campus schools, which are at or nearing full capacity. Expansion of these schools is constrained by planning and highways concerns. Expansion to Sarum Academy is possible
- **Economy:** this site is positioned approximately 0.3km to the north east of existing employment land at Old Sarum. The site is considered capable of delivering employment land to meet some economic needs, but the extent of this is unlikely to be wide reaching
- Minor or neutral effects are likely for biodiversity, land and soil, climate change, heritage, landscapes and transport

Summary of key mitigation measures:

- **Water resources:** consultation with the Environment Agency may be required to determine the likely effects of development within the areas identified within Source Protection Zones. Development should make suitable provision to protect surface, ground and potable drinking water quality – this includes ensuring that sufficient buffer zones are located adjacent to watercourses and ensuring that runoff does not enter these watercourses
- **Environmental pollution:** sensitive receptors include the adjacent Monarch's Way and Old Sarum conservation area – mitigation measures will be needed to reduce impacts on those. Mitigation measures could include locating higher density development towards the south-west of the site, adjacent to existing residential areas, with lower density development located nearer to open countryside. The site is near to Old Sarum airfield and potential impacts of airfield noise will need to be assessed

Salisbury Site 7 (SHELAA sites 3422, OM009, 3641, 3423, 3521)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- **Land and soil:** development of this site may not result in particularly high densities given the location of the Little Woodbury Ancient Settlement and the extent of landscape mitigation that may be required
- **Water resources:** the site is covered by a Drinking Water Protected Area which are areas, within the Water Framework Directive, where raw water is abstracted from rivers and reservoirs
- **Environmental pollution:** this site connects with the Harnham Gyratory which is congested, and further development has the potential to worsen this situation. A wider view is required of the network capacity – and the cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAs needs to be modelled and assessed
- **Energy:** there are opportunities for a site of this size to support energy generation from renewable and low carbon sources and create economic and employment opportunities in sustainable green technologies
- **Heritage:** development of the site would impact on the Scheduled Monument Woodbury Hillfort and settlement, a scheduled area and a former chalk pit. There is significant archaeological interest contained on the site in the form of the Scheduled Monument – Woodbury Ancient Villages which covers most of the site and of high archaeological value is Little Woodbury Iron Age settlement

- **Housing:** this site could bring forward a significant proportion of affordable housing as part of any housing development. The size of the site means it would be likely to support a wide range of house types and sizes to meet different needs
- **Inclusion:** overall, there could be significant social and economic benefits for the Salisbury area through housing provision, short-term construction jobs and a larger workforce for local businesses
- **Education:** primary provision could be incorporated into the emerging Netherhampton Road site. A new primary school onsite could be required if the school at Netherhampton Road was not able to support needs arising from this site. The site falls into the secondary school catchment for the Laverstock campus schools, which are at or nearing full capacity. Expansion of Sarum Academy may be possible.
- **Transport:** this site encompasses Britford Park & Ride, the loss of which would compromise the sustainability of East Harnham. If access through the Park & Ride site is being relied upon, Wiltshire Council have a lease on that site until 2063. This site connects with the Harnham Gyratory which is congested, and further development has the potential to worsen this situation
- **Economy:** this is a large site that is reasonably well connected to the City Centre. It benefits from access to A338 and close proximity to existing employment development. The site is capable of meeting wide ranging employment needs and would lend itself to mixed-use development
- Minor or neutral effects are likely for: biodiversity, climate change and landscapes

Summary of key mitigation measures:

- **Land and soil:** where possible, any development on this site should be located to reduce the loss of BMV agricultural land. The northern part of the site next to A338 Downton Rd consists of Britford Park & Ride and Salisbury Caravans business - developing this part of the site at higher densities would maximise the reuse of PDL.
- **Water resources:** development would need to protect from harm or pollution to any ground, surface or drinking water. This is particularly the case when designing Surface Water Drainage Systems where techniques such attenuation and infiltration may be limited. Consultation with the Environment Agency would be required to determine the likely effects of any development
- **Environmental pollution:** Noise impacts from the hospital site and Park and Ride would need to be assessed and mitigated; this may result in a reduction in the number of dwellings. The cumulative effects of any development on Harnham Road, Downton Road and existing AQMAs needs to be modelled and assessed
- **Energy:** the site presents opportunities to support energy generation from renewable and low carbon sources. To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources from developers
- **Heritage:** impacts on the scheduled monument are likely to be a significant constraint - the usual presumption would be in favour of preservation in situ. Contribution to significance requires assessment before potential for mitigation or impact on capacity can be considered. However, preservation of the scheduled monument in situ is likely to preclude development in that part of the site
- **Transport:** a wider view is required of the network capacity and the effects this will have on air quality on Downton Road, and in particular on Harnham Road

Salisbury Site 6 (SHELAA site S159)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- **Land and soil:** the site is located within a Mineral Safeguarding Area and development is likely to result in some sterilisation of the potential resource. Evidence shows this site consisting of mainly Grades 2 and 3 BMV although there is no differentiation between Grades 3a and 3b so further assessment will be required
- **Water resources:** the site is covered by a Drinking Water Protected Area which is where raw water is abstracted from rivers and reservoirs
- **Environmental pollution:** development of this large site will inevitably increase levels of environmental pollution, including noise, light and vibration – both during construction and operational phases. This site connects with the Harnham Gyratory which is congested, and further development has the potential to worsen this situation

- **Energy:** this site is one of the larger sites in Salisbury and so presents opportunities to support energy generation from renewable and low carbon sources
- **Heritage:** development of the site would impact on the Salisbury Conservation Area, Britford Conservation Area, as well as impact upon the setting of the Grade II Listed Bridge Farmhouse and farm buildings in Britford. The site would impact on the rural setting of both conservation areas and approaches to medieval city. Development would contribute to erosion of the separate identity of Britford
- **Landscapes:** the site contributes to a sense of separation between the suburban edge of Salisbury and the rural, low-density, village of Britford. It forms part of the river valley setting and the rural approach to Salisbury from the southeast, across which there are clear views of Salisbury Cathedral. There is higher sensitivity to the north and east of the site due its contribution to the rural approach to Salisbury and historic water meadow landscape
- **Housing:** site is capable of bringing forward a significant proportion of affordable housing. The size of the site means that it would be likely to support a wide range of house types and sizes to meet different needs
- **Inclusion:** overall, there could be significant social and economic benefits for the Salisbury area through housing provision, short-term construction jobs and a larger workforce for local businesses
- **Education:** primary provision could be incorporated into the emerging Netherhampton Road site but a new primary school onsite could be required if the school at Netherhampton Road was not able to support needs. The site falls into the secondary school catchment for the Laverstock campus schools, which are at or nearing full capacity. Expansion of these schools is constrained by planning and highways concerns, but expansion of Sarum Academy is possible
- **Transport:** this size of site is considered more than capable of incorporating mixed-uses into the design and layout. The cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAs will need to be modelled and assessed
- **Economy:** the site benefits from access to the A338 (Downton Road) and has reasonable connectivity to the City Centre. The location and size of the site suggests that it could have positive effects in supporting the City Centre.
- Minor or neutral effects are likely for biodiversity and climate change

Summary of key mitigation measures:

- **Land and soil:** development density will be influenced by the size of the site and landscape mitigation required due to the site's proximity to Britford Conservation Area, river valley and open countryside in the east and north of the site. Mineral constraints could be overcome through mitigation such as extraction of mineral prior to development
- **Water resources:** development would need to protect from harm or pollution to any ground, surface or drinking water. This is particularly the case when designing Surface Water Drainage Systems where techniques such attenuation and infiltration may be limited. Consultation with the Environment Agency would be required to determine the likely effects of any development
- **Environmental pollution:** a wider view is required of the network capacity – and the cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAs needs to be modelled and assessed
- **Energy:** to help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources from developers
- **Heritage:** further assessment of level of impact required. Mitigation likely to be difficult. A modest level of development on the western side of the site could provide an opportunity for mitigation/enhancement via softening harsh edge of existing development. Development towards the north and east of the site should be lower density or left as open space
- **Landscapes:** avoid development that reduces the sense of separation between Salisbury and Britford and conserve open views towards the Cathedral and over the river valley and water meadows that contribute to the distinctive approach to Salisbury
- **Transport:** a wider view is required of the network capacity and the effects this will have on air quality on Downton Road, and in particular on Harnham Road. The cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAs will need to be modelled and assessed

Salisbury Site 8 (SHELAA site 3421)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- **Land and soil:** the location of this site may not result in particularly high densities given its location on higher ground above Salisbury and the extent of landscape mitigation that may be required as a result
- **Environmental pollution:** this site connects with the Harnham Gyratory which is congested, and further development has the potential to worsen this situation
- **Energy:** this site is one of the larger sites in Salisbury and so presents opportunities to support energy generation from renewable and low carbon sources
- **Heritage:** the site is close to Scheduled Monument Woodbury Hillfort and Woodbury Ancient Villages and settlement. Site is likely to have archaeological interest. The sites' contribution to significance requires assessment before potential for mitigation or impact on capacity can be considered
- **Housing:** this site could deliver some affordable housing as part of any housing development, but the topography of the site limits the potential for a significant housing development, reducing the quantum that this site would be able to support
- **Inclusion:** overall, there could be significant social and economic benefits for the Salisbury area through housing provision, short-term construction jobs and a larger workforce for local businesses
- **Education:** primary provision could be incorporated into the emerging Netherhampton Road site or a new primary school onsite could be required if the school at Netherhampton Road was not able to support its needs. The site falls into the secondary school catchment for the Laverstock campus schools, which are at or nearing full capacity. Expansion of these schools is constrained by planning and highways concerns. Expansion to Sarum Academy is possible
- **Transport:** the site is large enough to easily incorporate a mixed-use development. This site connects with the Harnham Gyratory which is congested, and further development has the potential to worsen this situation
- Minor or neutral effects are likely for biodiversity, water resources, climate change, landscapes and economy

Summary of key mitigation measures:

- **Land and soil:** a significant portion of this site may need to be left undeveloped and used as open space and landscape mitigation due to the higher elevations – this will reduce housing quantum
- **Environmental pollution:** the site is on the southern edge of Salisbury on higher ground, although it will already be affected somewhat in terms of light pollution by residential development to the north. A wider view is required of the network capacity and the effects this will have on air quality on Downton Road, and in particular on Harnham Road. The cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAs needs to be modelled and assessed
- **Energy:** this site is one of the larger sites in Salisbury and so presents opportunities to support energy generation from renewable and low carbon sources
- **Heritage:** contribution to significance of Woodbury Hillfort and Woodbury Ancient Villages requires further assessment before the potential for mitigation or impact on capacity can be considered. Mitigation could include avoidance of high value archaeological remains where preservation in situ is likely to be required, particularly in the eastern part of the site where development may not be possible
- **Transport:** the site is large enough to easily incorporate a mixed-use development. A wider view is required of the network capacity and the effects this will have on air quality on Downton Road, and in particular on Harnham Road. The cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAs needs to be modelled and assessed

Salisbury Site 5 (SHELAA site S189)

Summary of likely significant issues:

- **Major adverse effects** (where mitigation is considered unachievable) are considered likely with this site for transport. It is therefore recommended that this site is not taken forward for further assessment
- **Transport:** the site is served by and would require access from the A36 which forms part of the Strategic Road Network. In order to accommodate the heavy A36 through traffic and facilitate right turners out of this site, a large roundabout or signalised junction would be required. Such infrastructure would need to conform to high design standards and would prove very costly and significantly impact upon the economic viability of the site
- **Water resources:** the site is covered by a Drinking Water Protected Area which is where raw water is abstracted from rivers and reservoirs
- Minor or neutral effects are likely for biodiversity, land and soil, environmental pollution, climate change, energy, heritage, landscapes, housing, inclusion and economy

Summary of key mitigation measures:

- **Transport:** any access delivery on this road would need to accord with Design Manual for Roads and Bridges and directly reflect upon the traffic flows along the main carriageway. Such design requirements (which Wiltshire Local Highway Authority support) would prove very costly and significantly impact upon the economic viability of the site. This would not be cost effective for the number of dwellings proposed. Mitigation is therefore considered unachievable
- **Water resources:** development would need to protect from harm or pollution to any ground, surface or drinking water. This is particularly the case when designing Surface Water Drainage Systems where techniques such attenuation and infiltration may be limited. Consultation with the Environment Agency would be required to determine the likely effects of any development

Salisbury Site 3 (SHELAA site 3554b)

Summary of likely significant issues:

- **Major adverse effects** (where mitigation is considered unachievable) are considered likely with this site for transport. It is therefore recommended that this site is not taken forward for further assessment
- **Transport:** access is considered unlikely to be achievable due to the need for expensive engineering and land constraints (rail tunnel widening, footway/cycleway provision in third party land), against a small number of houses. There is no linking footway or cycle infrastructure and no sufficient access to public transport. Routes through the Milford Mill Road railway Tunnel are not considered appropriate given the lack of footway and lack of opportunity to make such provision due to the narrow structure
- **Environmental pollution:** sensitive receptors include the adjacent Milford House Care Home, which is also a listed building, and the railway line – mitigation measures will be needed to reduce impacts on/from those. The rail line is elevated and the impact of noise on amenity is likely to be significant
- Minor or neutral effects are likely for biodiversity, land and soil, water resources, climate change, energy, heritage, landscapes, housing, inclusion and economy

Summary of key mitigation measures:

- **Transport:** site specific mitigation is unlikely to be achievable. Access is considered unlikely to be achievable due to the need for expensive engineering and land constraints (rail tunnel widening, footway/cycleway provision in third party land), against a small number of houses
- **Environmental pollution:** air quality impacts of this site are likely to be less significant as the site is relatively small but an air quality assessment showing cumulative effects of this development on relevant receptors in the AQMAs would be required. Given the proximity of the railway line, there would have to be a very high level of acoustic design

Salisbury Site 12 (SHELAA site S253)

Summary of likely significant issues:

- **Major adverse effects** (where mitigation is considered unachievable) are considered likely with this site. It is recommended that this site is not taken forward for further assessment
- **Biodiversity:** biodiversity of the site is likely to be high and would qualify as CWS. The site has good potential for protected species and wildlife generally. Significant additional land will be required to achieve biodiversity net gain; mitigation would therefore not be possible to achieve on site
- **Transport:** the site cannot derive access from Penning Road by virtue of a weight restricted, poorly maintained, narrow rail bridge, high gradients down to Wilton Road and a very poor junction onto the A36. A new railway bridge and new junction onto Wilton Rd would likely be very expensive. Access to the north of the site to Fugglestone Red would require 3rd party land and would need access through the adjacent Academy Site which is unlikely to be achievable due to existing building footprint and child safeguarding issues
- **Land and soil:** land needs restoration after former quarrying and industrial processing plant uses. Part of this site is a waste allocation (Wiltshire and Swindon Waste Site Allocations Local Plan 2013) including for Materials Recovery Facility/Waste Transfer Station, local recycling and waste treatment. Therefore, development for other uses would likely not be in accordance with this adopted policy
- **Water resources:** this site is covered by Source Protection Zone 2
- **Environmental pollution:** the site is adjacent to the A36 and railway line and noise impacts are likely. Salisbury has three Air Quality Management Areas (AQMAs) in respect of the nitrogen dioxide annual mean objective and exceedances exist on A36, A30 and at several hotspots in the city centre. Development of this site will significantly increase traffic on the A36
- **Energy:** this site is one of the larger sites in Salisbury and so presents opportunities to support energy generation from renewable and low carbon sources. To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources from developers. A site of this size could also enable some economic and employment opportunities in sustainable green technologies
- Minor or neutral effects are likely for climate change, heritage, landscapes, housing, inclusion and economy

Summary of key mitigation measures:

- **Biodiversity:** calculating net biodiversity gain for this site will be complicated. Surveys will be required (these will be extensive and potentially difficult to undertake) and any of the likely species present may significantly constrain development due to the need to translocate potentially high populations. Significant additional land will be required to achieve biodiversity net gain; mitigation would therefore not be possible to achieve on site
- **Transport:** site specific mitigation would include a new railway bridge and new junction with the A36 Wilton Road or access through the Academy site which would involve 3rd party land; all of which are deemed very difficult and expensive and may not be viable given likely quantum of development able to be achieved on site
- **Land and soil:** land needs restoration after former quarrying and industrial processing plant uses. A comprehensive contaminated land assessment would be required, including assessment for BCPs, before proposals for development are put forward. As part of this site is a waste allocation, development for other uses would likely not be in accordance with this adopted policy
- **Water resources:** development of the site would need to make necessary provision to protect from harm or pollution to any ground, surface or drinking water. Consultation with the Environment Agency may be required to determine the likely effects of development within the Source Protection Zone
- **Environmental pollution:** road traffic noise will need to be assessed and mitigated against to meet levels recommended in BS8233:2014. Significant traffic management measures are needed to remove levels of traffic from the A36. CIL/S106 contributions will be required to enable the council to take actions to enable the revocation of the AQMAs

Salisbury Site 4 (SHELAA sites S193, S97)

Summary of likely significant issues:

- Site 4 is considered the least sustainable site when assessed against the 12 SA objectives and when compared against all other sites
- No significant benefits are considered likely from development of this site
- **Major adverse effects** (where mitigation is considered unachievable) are considered likely with this site for transport. It is therefore recommended that this site is not taken forward for further assessment
- **Transport:** the site is served by and has direct access onto the A36 which forms part of the Strategic Road Network. Any access delivery on this road would therefore need to accord with Design Manual for Roads and Bridges which would not be cost effective for the number of dwellings proposed
- **Biodiversity:** the site has good potential for commuting and foraging bats due to the proximity of the railway and the number of mature trees. A variety of other wildlife may use the site including badgers, reptiles, breeding birds and possibly dormice due to the proximity of the railway
- **Water resources:** the site is covered by a Drinking Water Protected Area which is where raw water is abstracted from rivers and reservoirs
- **Environmental pollution:** the site is narrow and sandwiched between the A36 and the railway line. It will be challenging to achieve suitable noise levels given that there would be significant noise from two directions. There is also a risk of creating exposure to poor air quality due to proximity of the A36
- Minor or neutral effects are likely for land and soil, climate change, energy, heritage, landscapes, housing, inclusion and economy

Summary of key mitigation measures:

- **Transport:** in order to accommodate the heavy A36 through traffic and facilitate right turners out of this site, a large roundabout or signalised junction would be required to accommodate both queue capacity and/or facilitate gap acceptance for right turning. Such a junction would significantly impact upon the economic viability of the site and is not considered possible for a site of this size
- **Biodiversity:** within the site, net biodiversity gain should focus on buffering and enhancing the north, east and southern boundaries to ensure the mature trees are retained. Net gain should be targeted towards the land nearest the railway as this will help to mitigate the effect of development on this wildlife corridor. However, given the sites' small size (55m wide) and the proximity of mature trees, it may be impossible to deliver housing without a net biodiversity loss on site
- **Water resources:** development would need to protect from harm or pollution to any ground, surface or drinking water. This is particularly the case when designing Surface Water Drainage Systems where techniques such attenuation and infiltration may be limited. Consultation with the Environment Agency would be required to determine the likely effects of any development
- **Environmental pollution:** noise impact assessment and mitigation in accordance with BS8233:2014 would be required. A very high level of acoustic design will be needed with buildings acting as noise barriers on north and south boundaries and/or barriers/distancing. An air quality assessment will be required showing likely cumulative effects of this development on relevant receptors in the three AQMAs and those within the development adjacent to the A36

5.4 Trowbridge Principal Settlement

5.4.1 The site selection process (stages 1 and 2 in Figure 2.1) has informed the selection of 6 sites for further assessment through the SA. The separate Trowbridge 'site selection report' should be referred to for further information as to how these sites were chosen for further assessment through the SA. The 6 sites are shown on the following map:

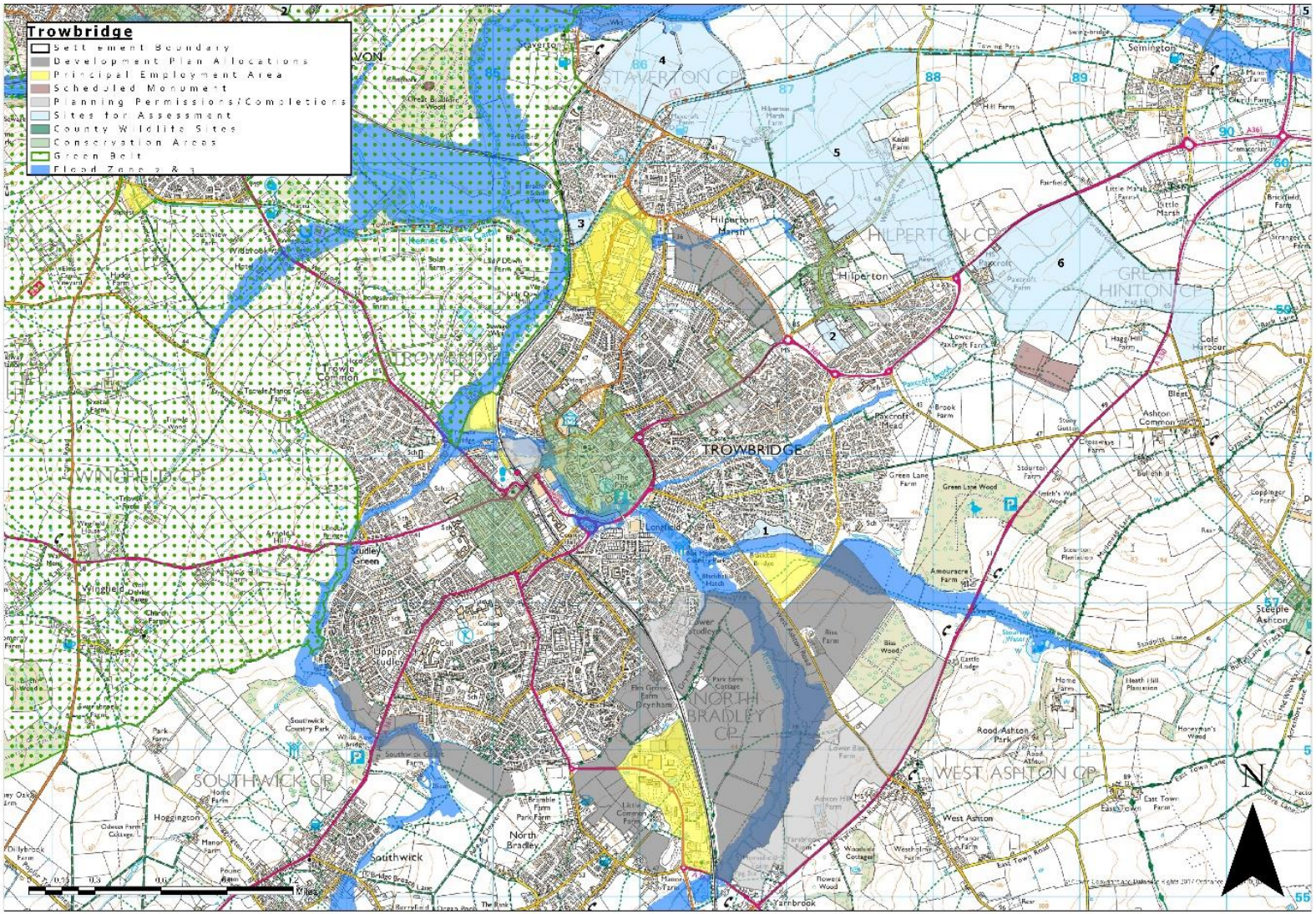


Figure 5.3: 'Reasonable alternative' development sites at Trowbridge

5.4.2 The sites, corresponding SHELAA references, size and approximate range of dwellings are shown in Table 5.5:

Table 5.5: 'Reasonable alternative' development sites at Trowbridge

Site	SHELAA ref(s)	Site size (Ha)	Approx. range (No. of dwellings)
1	3644	2.69	67 - 94
2	646, 647	2.72	68 - 95
3	425	2.90	72 - 101
4	3668 and 3687	41.66	1042 - 1458
5	3541, 3134, 723, 736, 644, 2093, 782923, 641	135.3	3382 - 4735
6	733, 734	81.99	2050 - 2870

5.4.3 The SA has identified the likely effects of developing these sites against a range of sustainability criteria and Table 5.6 presents the assessment scores and overall performance of each site. Sites are presented in order of performance in Table 5.6 with the more sustainable sites towards the top and less sustainable sites towards the bottom. This assessment has informed the selection of preferred options by the Council (stage 4 in Figure 2.1).

Table 5.6: Summary of the assessment of Trowbridge sites (in order of sustainability performance)

SITE	Sustainability performance (MORE → LESS)	Overall site score (+ position)	SA obj 1 (Biodiversity) overall score	SA obj 2 (Land + soil) overall score	SA obj 3 (Water) overall score	SA obj 4 (Air/poll'n) overall score	SA obj 5 (Climate) overall score	SA obj 6 (Energy) overall score	SA obj 7 (Heritage) overall score	SA obj 8 (Landscape) overall score	SA obj 9 (Housing) overall score	SA obj 10 (Inc comms) overall score	SA obj 11 (Transport) overall score	SA obj 12 (Economic) overall score
Site 6	MORE SUSTAINABLE ↑ ↓ LESS SUSTAINABLE	-3 (1st)	--	--	-	--	-	++	-	--	+++	++	--	+++
Site 5		-4 (=2nd)	--	--	--	--	-	+	--	-	+++	+++	--	+++
Site 4		-4 (=2nd)	--	--	--	--	-	++	-	--	+++	++	--	+++
Site 2		-5 (=4th)	--	-	-	-	-	+	-	-	+	+	-	+
Site 3		-5 (=4th)	---	-	-	-	-	+	-	-	+	++	-	+
Site 1		-9 (6th)	--	-	-	-	--	+	-	--	+	+	---	+

Key to likely significance of effects:

+++	Major positive effect = +3 points
++	Moderate positive effect = +2 points
+	Minor positive effect = +1 point
0	Neutral effect = 0 points
-	Minor adverse effect = -1 point
--	Moderate adverse effect = -2 points
---	Major adverse effect = -3 points

General mitigation measures relevant to all sites at Trowbridge

5.4.4 There are some mitigation measures that are relevant to all sites that could help to minimise the level of adverse effects and increase the sustainability benefits, and these will not be listed below against individual sites. This list is not exhaustive. Measures include the following:

- A minimum of 10% net gain for biodiversity within individual sites and overall layout and design should ensure that habitat creation provides connectivity to adjacent or nearby habitat areas
- Consideration should be given to the ecological sensitivity of areas around Trowbridge associated with the Bath and Bradford on Avon Bats SAC (Habitats Directive, Annex II) bat species e.g. foraging routes and roosting/maternity sites, and mitigation measures in the Trowbridge Bat Mitigation Strategy (TBMS). Several sites being considered are significantly affected by these highly sensitive areas
- Development should maximise the efficient use of land and use of previously developed land
- The availability of a range of reliable and accessible sustainable transport, including active travel, options is required to help avoid significant impacts on local air quality, allow travel for those without their own vehicle and to increase levels of exercise and wellbeing
- Plans for developing each site should take a proactive approach to mitigating and adapting to climate change through the design and layout of the site, ensuring high levels of energy efficiency in all new buildings, through mixed-use development that can reduce the need to travel and by ensuring as much choice and access as possible to efficient and reliable sustainable modes of transport
- Consideration of the inclusion of Sustainable Drainage Systems (SuDS) to control the risk of surface water flooding from impermeable surfaces and improve biodiversity

5.4.5 The likely impacts and mitigation measures listed below under each individual site are some of the significant issues that will need to be considered but this is not an exhaustive list. Further measures are included in the individual site assessments in Annex II and if development is proposed on any site, more detailed assessments of impacts and mitigation will need to be undertaken.

Trowbridge Site 6 (SHELAA sites 733, 734)

Summary of likely significant issues:

- Site 6 is considered the most sustainable site when assessed against the 12 SA objectives and when compared against all other sites
- No major adverse effects (where mitigation is considered unachievable) are likely
- **Biodiversity:** most of the site lies in the Bath & Bradford on Avon Bats SAC core area for Bechstein's bats. The site is likely to contain flight routes around the outskirts of Trowbridge that SAC bats use to access SAC mines to the north
- **Land and soil:** evidence shows this site as consisting of Grades 2, 3 and 4 BMV agricultural land with Grade 3 the most prominent. Development is therefore likely to lead to a significant permanent loss of both higher and lower quality agricultural land
- **Environmental pollution:** the scale of development likely on a site of this size will inevitably significantly increase levels of environmental pollution, including noise, light and vibration, as will the level of required transport infrastructure. Development will be taking place in an area which is currently open countryside, in agricultural use and with few roads or buildings. Noise, odour, dust and pest impacts from Paxcroft Farm and the industrial units there will also need to be appropriately assessed and mitigated
- **Energy:** this site is one of the larger sites in Trowbridge and so presents opportunities to support energy generation from renewable and low carbon sources and create economic and employment opportunities in sustainable green technologies
- **Landscapes:** overall, it is considered that the site is of generally medium landscape sensitivity to development, with higher sensitivity associated with the locally prominent Hagg Hill. The site has generally medium capacity to accommodate development

- **Housing:** this site is capable of bringing forward a large proportion of affordable housing as part of a development of a significant number of new homes of different types and tenures
- **Inclusion:** likely significant benefits in terms of affordable housing provision alongside employment, community facilities, public open space, amenity greenspace, schools and healthcare
- **Education:** two 2FE primary schools will be required on sites of at least 2ha to meet primary schooling needs. A new secondary school for the settlement is likely to be required to meet the proposed level of growth and this may be able to support secondary needs arising from this site
- **Transport:** the site is disconnected from Trowbridge with limited opportunities for walking and cycling and its location could minimise sustainable mode share. The site is not of a scale that requires access to both the A361 and A350. If a single access point is to be provided, then this should be achieved from the A361 to minimise journey lengths into Trowbridge
- **Economy:** this is a large site that is likely to be able to support the town centre, as well as existing local facilities, if connectivity through sustainable transport modes were improved. The size of this site suggests that it would be capable of delivering a mixed-use development, incorporating employment land that could meet a range of economic needs, including those for higher skilled employment
- Minor or neutral effects are likely for water resources, climate change and heritage

Summary of key mitigation measures:

- **Biodiversity:** principles for buffering and offsetting habitats can be drawn from experience with the Trowbridge Bat Mitigation Strategy (TBMS) but additional habitat will be required to deliver net biodiversity gain. Any subsequent development proposals would need to be informed by an ecological assessment in order to determine the scale and location of development alongside potential mitigation measures
- **Land and soil:** to reduce loss of higher quality agricultural land, where possible, any development on this site should be located to reduce the loss of BMV, with development of lower quality land instead
- **Environmental pollution:** potential impacts from adjoining land uses will need to be appropriately assessed and mitigated. Constraints are on one side of the site and suitable mitigation should be achievable without a significant impact on the number of dwellings. Sites 7,8 and 10 are major sites in the same general geographical area and whilst they are not individually show stoppers, the pressure that they in combination would put on existing heavily trafficked local roads means that assessment of air quality impacts over the broad range of these sites needs to be done as a priority at the master plan stage and mitigation and lifestyle changes incorporated
- **Landscapes:** while development would have an adverse effect on the landscape, the site is of a size whereby landscape mitigation could be employed by avoiding development on higher landform where it would be prominent in the wider landscape, creation of a strong landscape buffer to the east of the site to maintain separation between the site and outlying rural settlements, and retention of hedgerows, trees and woodland as part of a mature landscape framework that contributes to a network of green infrastructure and rural setting of Hilperton and east of Trowbridge
- **Transport:** a significant amount of new road and sustainable transport infrastructure will be required. There would need to be significantly improved walking and cycling connectivity with Trowbridge and bus service uplift.

Trowbridge Site 5 (SHELAA sites 3541, 3134, 723, 736, 644, 2093, 782923, 641)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- **Biodiversity:** The southern third of the site lies in the Bath & Bradford on Avon Bats SAC core area for Bechstein's bats, and two fields at Maxcroft Farm in the north west are within the core area for greater horseshoe bats. The site is likely to contain flight routes around the outskirts of Trowbridge that SAC bats use to access SAC mines to the north.
- **Land and soil:** This is a very large site that is mostly in agricultural use. Given the size of the site and likely permanent loss of greenfield, agricultural land, significant adverse effects are considered likely.

- **Water resources:** The level of development will put existing infrastructure under significant pressure.
- **Environmental pollution:** The scale of development likely on a site of this size will inevitably significantly increase levels of environmental pollution, including noise, air, light and vibration – both during construction and operational phases, as will the level of required transport infrastructure.
- **Historic Environment:** There are several listed buildings adjacent or close to the site. The site is located adjacent to the Kennet and Avon canal and former wharf. These assets (canal, wharf and other wharfside buildings) relate primarily to each other and the understanding of the historic transport route. The site borders a conservation area which follows the extent of the historic built settlement and the site appears to be heavily constrained by archaeological remains.
- **Housing:** this site is capable of bringing forward a large number of affordable homes as part of a development of a significant number of new homes with a wide range of house types and sizes
- **Inclusion:** likely significant benefits in terms of affordable housing provision alongside employment, community facilities, public open space, amenity greenspace, schools and healthcare
- **Education:** this site will generate a significant need for early years, primary and secondary facilities which would most probably need to be located on site.
- **Transport:** The local road network may struggle to accommodate the influx of vehicles generated without adequate mitigation.
- **Economy:** This site could provide very high levels of new housing, including affordable housing, employment and associated infrastructure that will help support the local economy and economic growth, including new highway infrastructure.
- Minor or neutral effects are likely for climate change, energy and landscapes

Summary of key mitigation measures:

- **Biodiversity:** Any development proposals should be informed by ecological assessment in order to determine the scale and location of development alongside potential mitigation measures. As this is a very large site there would be plenty of scope to avoid and mitigate impacts of habitat loss. There is potential for large-scale land implications e.g. 100m wide corridors will need to be set aside.
- **Land and soil:** Development should achieve an efficient use of land through maximising densities to reduce agricultural land loss. The main areas where contaminated land may exist are at the working farms within the site. A more detailed assessment of the site would be required prior to any development coming forward.
- **Water resources:** Significant investment is likely to be required to supply water, sewerage and drainage infrastructure to the site, to serve this level of development.
- **Environmental pollution:** This site contains a number of working farms. Impacts of these farms, such as noise, odour, dust, pests etc will need to be assessed but given the nature of farms the most effective method of mitigation is to provide distance separation and possibly barriers and bunds. Sites 7,8 and 10 are major sites in the same general geographical area and the pressure that they in combination would put on existing heavily trafficked local roads means that assessment of air quality impacts over the broad range of these developments needs to be done as a priority at the master plan stage.
- **Historic Environment:** Mitigation can be achieved through appropriate design which meets with CP57 requirements but this may impact on the capacity of the site. Large site so mitigation of impact on heritage assets is likely to be possible. Further investigation is likely to be needed in order to understand the nature and extent of archaeological remains across the site, particularly in the northern areas where identified remains are less understood.
- **Transport:** The site is large and the local road network may struggle to accommodate the influx of vehicles generated. In order to address this, no more than 3000 dwellings should be proposed with access onto the A361.

Trowbridge Site 4 (SHELAA sites 3668 and 3687)

Summary of likely significant issues:

- No major adverse effects (where mitigation is considered unachievable) are likely
- **Biodiversity:** there are three wildlife corridors on the perimeter of the site, and it is highly likely these will be key SAC bat flight routes to and from the SAC. The western half of the site lies in the Bath & Bradford on Avon Bats SAC core area for greater horseshoe bats. The site could contain flight routes around the outskirts of Trowbridge that SAC bats use to access the SAC mines to the north
- **Land and soil:** the northern two thirds of the site are located in a Sand and Gravel Mineral Safeguarding Area so the potential resource would likely be substantially sterilised
- **Water resources:** approximately 30% of the site is covered by Source Protection Zone 2c which is an extension to the outer protection zone and the site is covered by a Drinking Water Protected Area
- **Environmental pollution:** this site is adjacent to the railway line and the CPW cereals factory is next to the railway. Possible noise and odour impacts. Sites 7,8 and 10 are major sites in the same general geographical area and whilst they are not individually showstoppers, the pressure that they in combination may put on existing heavily trafficked local roads means that air quality impacts could be significant
- **Energy:** this site is one of the larger sites in Trowbridge and so presents opportunities to support energy generation from renewable and low carbon sources. A site of this size could enable economic and employment opportunities in sustainable green technologies
- **Landscapes:** development would have an adverse effect on the landscape, but mitigation measures are possible. Overall, it is considered that the site is of generally medium landscape sensitivity to development, with high sensitivity to boundaries with the River Avon and the canal. The site has generally medium capacity to accommodate development
- **Housing:** this site may be capable of bringing forward a large proportion of affordable housing as part of a development of a significant number of new homes with a wide range of house types and sizes
- **Inclusion:** likely significant benefits in terms of affordable housing provision alongside employment, community facilities, public open space, amenity greenspace, schools and healthcare
- **Education:** some primary level needs could be met through the surplus of places at Staverton Primary. Additionally, primary needs could be met at new schools on site 7, if it were to come forward, but it is unlikely that this site would be able to support a new primary school alone. A new secondary school for the settlement is likely to be required to meet the proposed level of growth and this may be able to support secondary needs arising from this site
- **Transport:** The site is bounded by a congested road in the form of the B3105, a railway line and a canal. These boundary constraints reduce the opportunities to deliver a site accessible by all modes of transport without adding to current levels of local congestion.
- **Economy:** there is a poor level of existing accessibility between the site and town centre but the size of this site suggests it would be capable of delivering a mixed-use development, incorporating employment land that could meet a range of economic needs, including those for higher skilled employment
- Minor or neutral effects are likely for climate change and heritage

Summary of key mitigation measures:

- **Biodiversity:** the three wildlife corridors on the perimeter will need to be buffered by at least 100m buffers. Any internal hedgerows demonstrated to be core bat habitat would need to be mitigated in accordance with the TBMS principles i.e. retained within 45m corridors centred on the hedgerow. This will considerably reduce the capacity of the site but will go much of the way towards meeting the net gain requirements. Any subsequent development proposals would need to be informed by an ecological assessment in order to determine the scale and location of development alongside potential mitigation measures
- **Land and soil:** a significant area of potential minerals could be lost but this could be overcome through mitigation such as extraction of mineral prior to any development
- **Water resources:** development would need to make suitable provision to protect and, where appropriate, improve local surface, ground and potable drinking water quality. Consultation with

the Environment Agency may be required to determine the likely effects of development within the Source Protection Zone
- **Environmental pollution:** noise and odour assessments will be required given adjacent land uses but these are on one side of the site only and suitable mitigation should be achievable without a significant impact on the number of dwellings
- **Landscapes:** landscape mitigation could include limiting development in the east and south of the site, in proximity to the River Avon and Kennet and Avon canal, in order to conserve the alignment of the canal and retain open land and vegetation features as part of an integrated settlement edge. This should contribute to a green buffer to settlement areas and a strategic green gap along the B3105 to help integrate new and existing settlements
- **Transport:** on-site employment, health, retail, education and other facilities may be required to reduce out-commuting and reduce impacts on existing roads.

Trowbridge Site 2 (SHELAA sites 646, 647)

Summary of likely significant issues:
- No major adverse effects (where mitigation is considered unachievable) are likely
- **Biodiversity:** this site acts as an extension of open habitat at Hilperton Gap where surveys have demonstrated use by SAC bats. In view of the site's position and habitat composition there is good potential for foraging and commuting by SAC bats and bat species in general. It will be difficult to develop the site while at the same time giving the level of protection required by the Trowbridge Bat Mitigation Strategy (TBMS). In addition, the TBMS requires 100% mitigation for loss of any greenfield habitat. Given its small size and geographical position the site is unlikely to have capacity to do this or to meet the policy requirement for net biodiversity gain
- Minor or neutral effects are likely against the rest of the SA objectives - land and soil, water resources, environmental pollution, climate change, energy, heritage, landscapes, housing, inclusion, transport and economy

Summary of key mitigation measures:
- **Biodiversity:** development could be mitigated through an offsite scheme to deliver mitigation and net gain in a location which is strategically better for SAC bats. The quantum of land required would need to be calculated using the Biodiversity Metric and would need to be secured in perpetuity. Decoupling the mitigation from the application site would also allow land to be secured to deliver net gain. If great crested newts are present, it will be difficult / impossible to provide effective mitigation on site and therefore the applicant should apply for District Level Licensing

Trowbridge Site 3 (SHELAA site 425)

Summary of likely significant issues:
- **Major adverse effects** (where mitigation is considered unachievable) are considered likely with this site for biodiversity. It is therefore recommended that this site is not taken forward for further assessment
- **Inclusion:** although a relatively small site, because it is located in a more socially deprived area and adjoins areas with moderate levels of deprivation, a housing development could have more significant social benefits in this area, particularly in terms of affordable housing provision.

Summary of key mitigation measures:
- Providing a 20m buffer to the railway and the canal and keeping out of the flood zone leaves about 1 hectare of developable land, all of which would have to be compensated with at least double the land area elsewhere due to loss of high scoring biodiversity habitat. It is considered very unlikely that this site would be viable for development and therefore major adverse effects are shown for biodiversity with mitigation considered not achievable.

Trowbridge Site 1 (SHELAA site 3644)

Summary of likely significant issues:
- Site 1 is considered the least sustainable site when assessed against the 12 SA objectives and when compared against all other sites

- No significant benefits are considered likely from development of this site
- **Major adverse effects** (where mitigation is considered unachievable) are considered likely with this site for transport. It is therefore recommended that this site is not taken forward for further assessment
- **Transport:** delivering a vehicular access is considered very problematic with either third party land ownership constraints or engineering constraints that would likely be prohibitive given the size of development. It is considered that mitigation is unlikely to be achieved and major adverse effects are likely
- **Biodiversity:** the site lies within the Bath & Bradford on Avon Bats SAC core area for Bechstein's bats and lies within the grey hatched zone (medium risk for effects of recreational pressure) and yellow zone (medium risk for effects of habitat loss) in the TBMS. The site is situated between the Green Lane Woodland Complex CWS and Biss Meadows CWS. The Blackball Brook tributary runs along the southern boundary of the site and links these two wildlife sites. There is potential for significant adverse effects given the sites' location
- **Climate change:** there is significant flood risk to some of the site associated with both fluvial and pluvial surface water flooding, which may be exacerbated by climate change
- **Landscapes:** this site is of generally medium landscape sensitivity to development, due to its contribution to connectivity of greenspaces including the country park and ancient woodland. The site has generally medium capacity to accommodate development, particularly considering the setting of the watercourse linking into Biss Meadows Country Park
- Minor or neutral effects are likely for land and soil, water resources, environmental pollution, energy, heritage, housing, inclusion and economy

Summary of key mitigation measures:

- **Biodiversity:** there would need to be up to a 30m buffer adjacent to Trowbridge Lodge Park. Many trees at the park have the potential to support roosts of Bechstein's bats and the park may be used by Bechstein's and horseshoe bats for foraging. There is a need to buffer core bat habitat in accordance with the TBMS and a need to demonstrate net gain through the Biodiversity Metric. Any development proposals would need to be informed by an ecological assessment in order to determine the scale and location of development alongside potential mitigation measures
- **Climate change:** plans for developing this site should take a proactive approach to mitigating and adapting to climate change. Specifically, wide buffer zones should be left adjacent to the Blackball Brook. Consideration should be given to sequentially planning development to ensure the risk of flooding is alleviated. Further detailed modelling work (SFRA Level 2) may be required
- **Landscapes:** landscape mitigation could be employed by avoiding development that would break the treed skyline associated with the wooded settlement edge and retaining a significant buffer to the watercourse, riparian vegetation and trees as part of a mature landscape framework

6. Conclusions and next steps

6.1 Conclusions

6.1.1 This Interim SA Report includes assessments of the current proposals within the draft Local Plan Review and reasonable alternatives to those. At this stage, those proposals include housing and employment requirements and their distribution across the county and preferred development sites at the Principal Settlements only. The SA has outlined the likely effects of these proposals, and reasonable alternatives, and set out potential mitigation measures that could reduce some of the adverse effects and increase some of the benefits.

6.1.2 The SA has assessed the strategies for distributing growth within the four HMAs, both at higher and lower levels of growth, and outlined the likely effects at a settlement and rural area level, together with providing recommendations for how these strategies could be amended to increase sustainability. This was a 'high-level' assessment based on different distributions without the knowledge of potential sites or growth areas at settlements, but the assessment was based on a detailed knowledge of issues being experienced at each settlement and rural area.

6.1.3 For the higher growth strategies, there are likely to be more significant adverse environmental impacts at certain more constrained settlements. However, this higher level of growth at those settlements is still at a relatively modest level such that mitigation measures are likely to be able to sufficiently reduce any adverse effects. The SA has consistently noted the housing affordability issues at some of these settlements, whereby to allocate lower levels of housing could have significant social and economic impacts for those areas.

6.1.4 The SA has not noted any impacts of such significance that would prevent development at the higher level (LHNA) from coming forward. However, several key recommendations have been made to amend the distribution of growth in some areas that would help reduce the significance of impacts and increase benefits. Those key recommendations are:

- In Chippenham HMA, to explore an additional/amended development strategy that would reduce proposed development levels in/around the more environmentally constrained settlements of Malmesbury, Corsham and Devizes to the lower levels in Strategy CH-B (or lower). Such a strategy would increase the growth requirement at the less environmentally constrained settlements of Melksham, Calne and Chippenham and in the Rest of the HMA

- In Salisbury HMA, i) to reduce growth levels at Salisbury to reduce the likelihood of significant effects and re-distribute to other areas in the HMA, especially to Amesbury and Tidworth/Ludgershall, and ii) to reassess the likely effects of a new settlement when/if further details of a location is known as the assessment has shown likely significant social and economic benefits from such a project

- In Swindon HMA, to increase levels of growth at Royal Wootton Bassett and in the Rest of the HMA as they are considered able to accommodate higher levels of growth that could help sustain and provide new services and facilities. Provision of affordable housing at Marlborough should be prioritised to meet identified needs

- In Trowbridge HMA, given the significant existing environmental constraints at the Principal Settlement of Trowbridge, it is recommended that a new strategy is formulated that reduces the housing requirement at Trowbridge and possibly at Bradford on Avon. This could be re-distributed to Warminster, Westbury and possibly to rural areas, or to a different HMA. If this is not considered possible, consideration should be given to the following:

    - a focus on delivering brownfield sites in Trowbridge town centre;

    - an assessment of potential available sites that are not adjacent to the Trowbridge town boundary but could have less environmental impacts than sites that are closer to the town; and

  - a review of the Green Belt at Trowbridge and Bradford on Avon which could free up certain sites on the edge of the towns.

- In Trowbridge HMA, to prioritise provision of affordable housing at Bradford on Avon to meet identified needs, perhaps through application of a specific affordable housing policy requirement for the town that is higher than for other parts of Wiltshire, subject to viability testing

6.1.5 Regarding potential development sites at the Principal Settlements, the assessment has produced a comparison of those sites based on their overall sustainability and recommended mitigation measures for likely significant effects, where relevant. This has informed the Council's selection of preferred options which is explained in separate site selection papers for each individual settlement.

6.2 Next steps

6.2.1 This Interim SA Report is being consulted on from 13th January 2021 to 9th March 2021 as part of the Regulation 18 consultation on the Wiltshire Local Plan Review.

6.2.2 A formal SA Report of the pre-submission draft Plan at Regulation 19 stage will be produced and consulted on alongside that Plan. This is scheduled[58] for quarter 4 of 2021. That SA Report will include a full assessment of the Plan as a whole and its policies, including 'reasonable alternatives', meeting the requirements of the SEA Directive and Regulations.

[58] Wiltshire Local Development Scheme (Wiltshire Council, July 2020)

Appendix A – Sustainability Appraisal Framework

Sustainability Appraisal topic	Sustainability Appraisal Objective	Decision-Aiding Questions (DAQs). Will the option…
Biodiversity	1. Protect and enhance all biodiversity and geological features and avoid irreversible losses.	1. Avoid potential adverse impacts of development on local biodiversity and geodiversity? 2. Protect and enhance designated and non-designated sites, priority species and habitats and protected species? 3. Ensure that all new developments protect Local Geological Sites (LGSs) from development? 4. Aid in the delivery of a network of multifunctional Green Infrastructure?
Land and Soil Resources	2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings	1. Ensure development maximises the efficient use of land? 2. Maximise the reuse of Previously Developed Land? 3. Encourage remediation of contaminated land? If so, would this lead to issues of viability and deliverability? 4. Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)? 5. Lead to the sterilisation of viable mineral resources? If so, is there potential to extract the mineral resource as part of the development? 6. Support the provision of sustainable waste management facilities and include measures to help reduce the amount of waste generated by development through integrated recycling infrastructure?
Water Resources	3. Use and manage water resources in a sustainable manner	1. Protect surface, ground and drinking water quantity/quality? 2. Direct development to sites where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?
Air Quality and Environmental Pollution	4. Improve air quality and reduce all sources of environmental pollution	1. Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration? 2. Reduce impacts on, and work towards improving and locating sensitive development away from areas likely to experience poorer air quality due to high levels of traffic and poor air dispersal? 3. Lie within a consultation risk zone for a major hazard site or hazardous installation?
Climatic Factors	5. Minimise our impacts on climate change (mitigation) and reduce our vulnerability to future climate change effects (adaptation).	1. Maximise the creation and utilisation of renewable energy opportunities, including low carbon community infrastructure such as district heating? 2. Be located within Flood Zones 2 or 3? If so, are there alternative sites in the area within Flood Zone 1 that can be allocated in preference to developing land in Flood Zones 2 or 3? (To be determined through the application of the Sequential Test). 3. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere? 4. Promote and deliver resilient development that is capable of adapting to the predicted effects of climate change, including increasing temperatures and rainfall, through design e.g. rainwater harvesting, Sustainable Drainage Systems, permeable paving etc.
Energy	6. Increase the proportion of energy generated by renewable and low carbon sources of energy	1. Support the development of renewable and low carbon sources of energy? 2. Be capable of connecting to the local Grid without the need for further investment? 3. Create economic and employment opportunities in sustainable green technologies? 4. Deliver high-quality development that maximises the use of sustainable construction materials? 5. Deliver energy efficient development that exceeds the minimum requirements set by Building Regulations?
Historic Environment	7. Protect, maintain and enhance the historic environment.	1. Conserve and enhance World Heritage Sites, Scheduled Monuments, Listed Buildings, the character and appearance of Conservation Areas, Historic Parks & Gardens, sites of archaeological interest and, where appropriate, undesignated heritage assets and their settings?

		2. Maintain and enhance the character and distinctiveness of settlements through high quality and appropriate design, taking into account, where necessary, the management objectives of Conservation Areas?
Landscapes	8. Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.	1. Minimise impact on and, where appropriate, conserve and enhance nationally designated landscapes e.g. National Parks and AONBs, and their settings? 2. Minimise impact on, and enhance, locally valued landscapes through high quality, inclusive design of buildings and the public realm? 3. Protect and enhance rights of way, public open space and common land?
Population and Housing	9. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	1. Provide an appropriate supply of affordable housing? 2. Support the provision of a range of house types and sizes to meet the needs of all sectors of the community?
Healthy and Inclusive communities	10. Reduce poverty and deprivation and promote more inclusive and communities with better services and facilities.	1. Maximise opportunities for affordable homes and job creation within the most deprived areas? 2. Be accessible to educational, health, amenity greenspace, community and town centre facilities which are able to cope with the additional demand? 3. Promote/create public spaces and community facilities that might support public health, civic, cultural, recreational and community functions? 4. Reduce the adverse impacts associated with rural isolation, including through access to affordable local services for those living in rural areas without access to a car?
Transport	11. Reduce the need to travel and promote more sustainable transport choices.	1. Promote mixed-use developments, in accessible locations, that reduce the need to travel and reduce reliance on the private car? 2. Provide suitable access and not significantly exacerbate issues of local transport capacity? 3. Make efficient use of existing transport infrastructure and promote investment in sustainable transport options, including Active Travel?
Economy and Enterprise	12. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth.	1. Support the vitality and viability of town centres (proximity to town centres, built up areas, station hub)? 2. Provide a variety of employment land to meet all needs, including those for higher skilled employment uses that are (or can be made) easily accessible by sustainable transport, including active travel? 3. Contribute to the provision of infrastructure that will help to promote economic growth, including opportunities to maximise the generation and use of renewable energy and low-carbon sources of energy? 4. Promote a balance between residential and employment development to help reduce travel to work distances?