

RWB56b



VISION DOCUMENT ROYAL WOOTTON BASSETT

On behalf of TOF Corporate Trustee Ltd, as directed by
Oxford University Endowment Management

March 2021

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INTRODUCTION





Royal Wootton Bassett

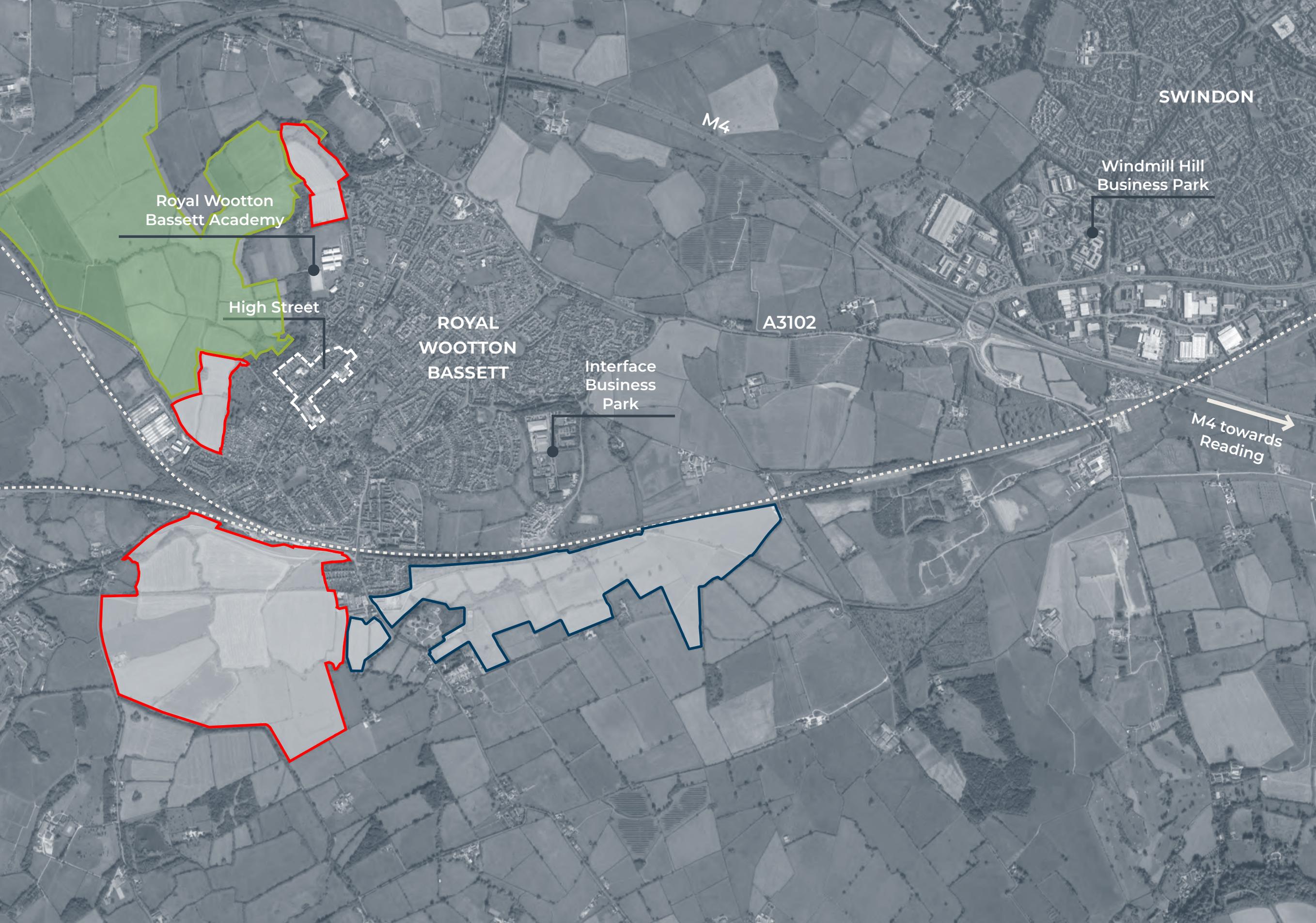
This document has been prepared on behalf of TOF Corporate Trustee Limited (TOF Ltd), as directed by Oxford University Endowment Management (OUEM), who control land to the South and West of Royal Wootton Bassett. This document demonstrates how we consider three of these areas can help in providing housing, strategic green spaces, additional employment, schools and new leisure, community and retail facilities to support the existing town centre in the form of a comprehensive strategy for the town, and a sustainable urban extension.

The strategic framework demonstrates that the land to the south of Royal Wootton Bassett (S-RWB) could accommodate between 2,000 - 2,300 dwellings, employment, a local centre with primary school education and substantial open space, creating a sustainable urban extension to Royal Wootton Bassett. Two other areas to the west of the town, off Maple Drive and north of Whitehill Lane could also provide a combined 250 units, land for new allotments and a new community campus.

As part of the larger strategic site, the proposals will deliver a southern relief road to Royal Wootton Bassett, to alleviate congestion in the town centre.

-  Site Boundary (within TOF ownership)
-  Site Boundary (other ownership)
-  Other land within TOF ownership





SWINDON

Windmill Hill
Business Park

Royal Wootton
Bassett Academy

High Street

ROYAL
WOOTTON
BASSETT

Interface
Business
Park

M4

A3102

M4 towards
Reading

CONTEXT





CONTEXT

A STRATEGY FOR GROWTH

The most sustainable places for growth are nearer to existing settlements, where people are able to travel shorter distances to get to their main areas of shopping, leisure and work.

When distances are shorter, people are much more likely to use sustainable modes of transport, such as buses and bicycles. This is particularly true of places that already have bus services where the frequency or services can be improved. Shorter distances also mean that when people do travel by car, impacts are minimised.

Within the Swindon housing market area in Wiltshire, Royal Wootton Bassett and Marlborough are the two most sustainable locations for development. Of these two locations, Royal Wootton Bassett should be favoured because:

- Marlborough is subject to a significant constraint in the form of the North Wessex Downs AONB
- Both towns are in the Swindon housing market area (HMA), but only Royal Wootton Bassett is within the 'travel to work area by bus' (source: ONS data)
- Journey times by bus from Marlborough to Swindon are much greater than from Royal Wootton Bassett (see table above)
- Royal Wootton Bassett is linked to Swindon with a frequent bus network

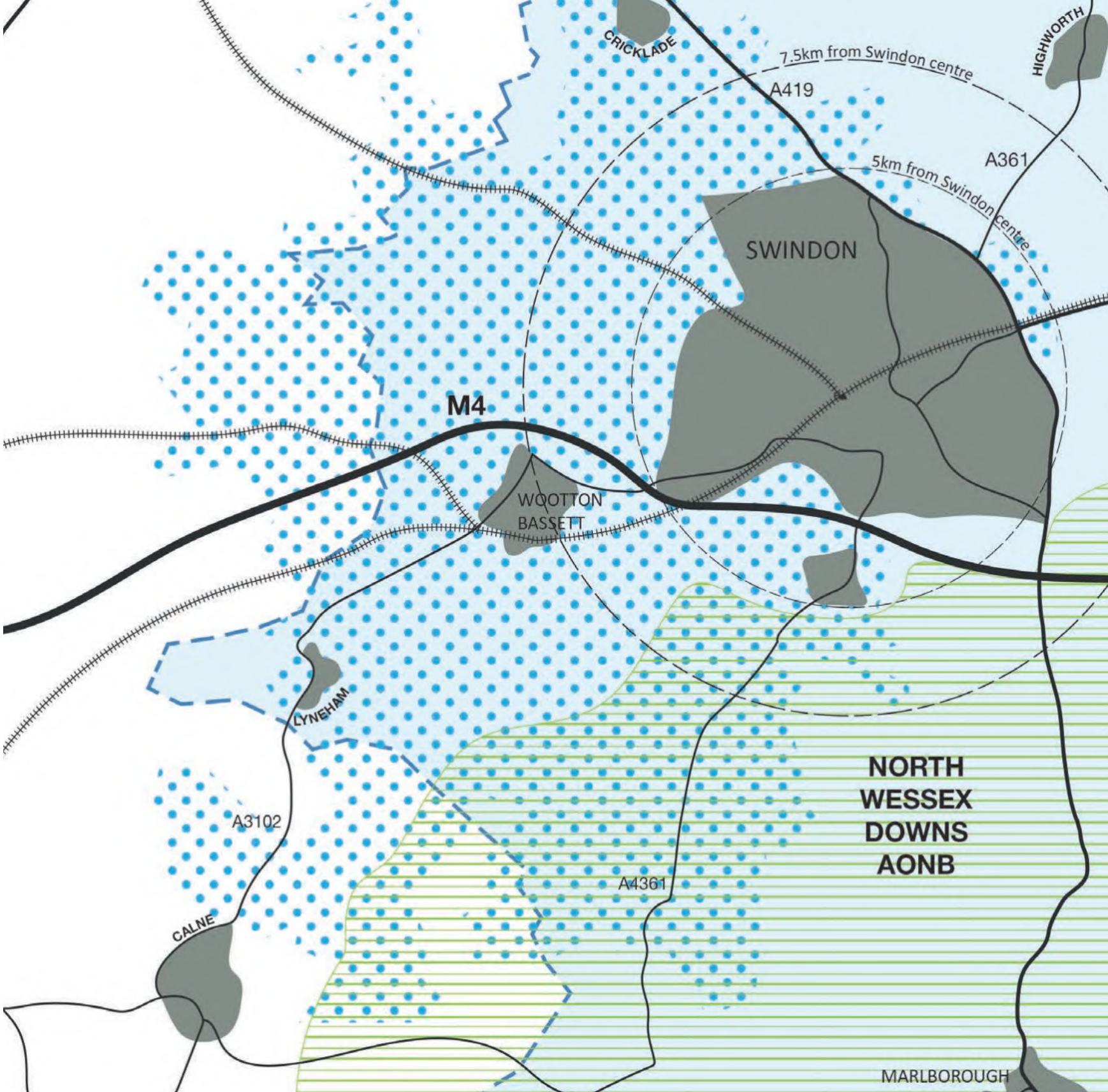
The centre of Royal Wootton Bassett is focused around the High Street (A3102), from which a number of retail and community services have grown.

However, the A3102 is also the primary vehicular route through the town which links to Junction 16 of the M4 and Swindon. As vehicular traffic has increased on the roads, this has led to congestion and caused negative impacts on the street environment for pedestrians and visitors to the services within the town centre.

Over time, this problem may be mitigated in time if the reduction in car ownership amongst the younger population continues. However, to support the town centre environment and create a healthier and more attractive pedestrian experience, a relief road would provide an alternative route for traffic to easily access the wider network.

KEY PUBLIC TRANSPORT SERVICES

	FREQUENCY	JOURNEY TIME
ROYAL WOOTTON BASSETT	The 55 Gold runs about every 15 minutes with other services in between	22-36 minutes
MARLBOROUGH	The X5 and 80 services run approximately every hour	50-75 minutes



Swindon Housing Market Area (HMA)
 Swindon Travel to Work Area by Bus
 Area of Outstanding Natural Beauty (AONB)

We propose that Land South of Royal Wootton Bassett would deliver a new urban extension, linked to the existing town, but with its own character and identity, which integrates a new relief road, open space and supporting community facilities into the design.

The new extension would be based on the following principles:

- Connected communities:** improving the strategic connections to Swindon and minimising wider traffic impacts, maximising local connectivity using the existing bus and cycle network;
- Provision of new facilities:** two linked centres providing a range of community, health, retail and leisure facilities; and
- Accessible Green Spaces:** delivering development in a framework of strategic green space, in accordance with a town wide strategy, with smaller green spaces throughout the development that encourage physical activity and create healthy places people want to inhabit.

GROWTH OPTIONS FOR ROYAL WOOTTON BASSETT

CONNECTIVITY AND INFRASTRUCTURE

The centre of Royal Wootton Bassett is focused around the High Street (A3102), from which a number of retail and community services have grown.

However, the A3102 is also the primary vehicular route through the town which links to Junction 16 of the M4 and Swindon. As vehicular traffic has increased on the roads, this has led to congestion and caused negative impacts on the street environment for pedestrians and visitors to the services within the town centre.

Over time, this problem may be mitigated in time if the reduction in car ownership amongst the younger population continues. However, to support the town centre environment and create a healthier and more attractive pedestrian experience, a relief road linking the A3102 Hunts Mill Road to the west with Bicknoll Lane to the east, including a new crossing of the railway would provide an alternative route for traffic to easily access the wider network.

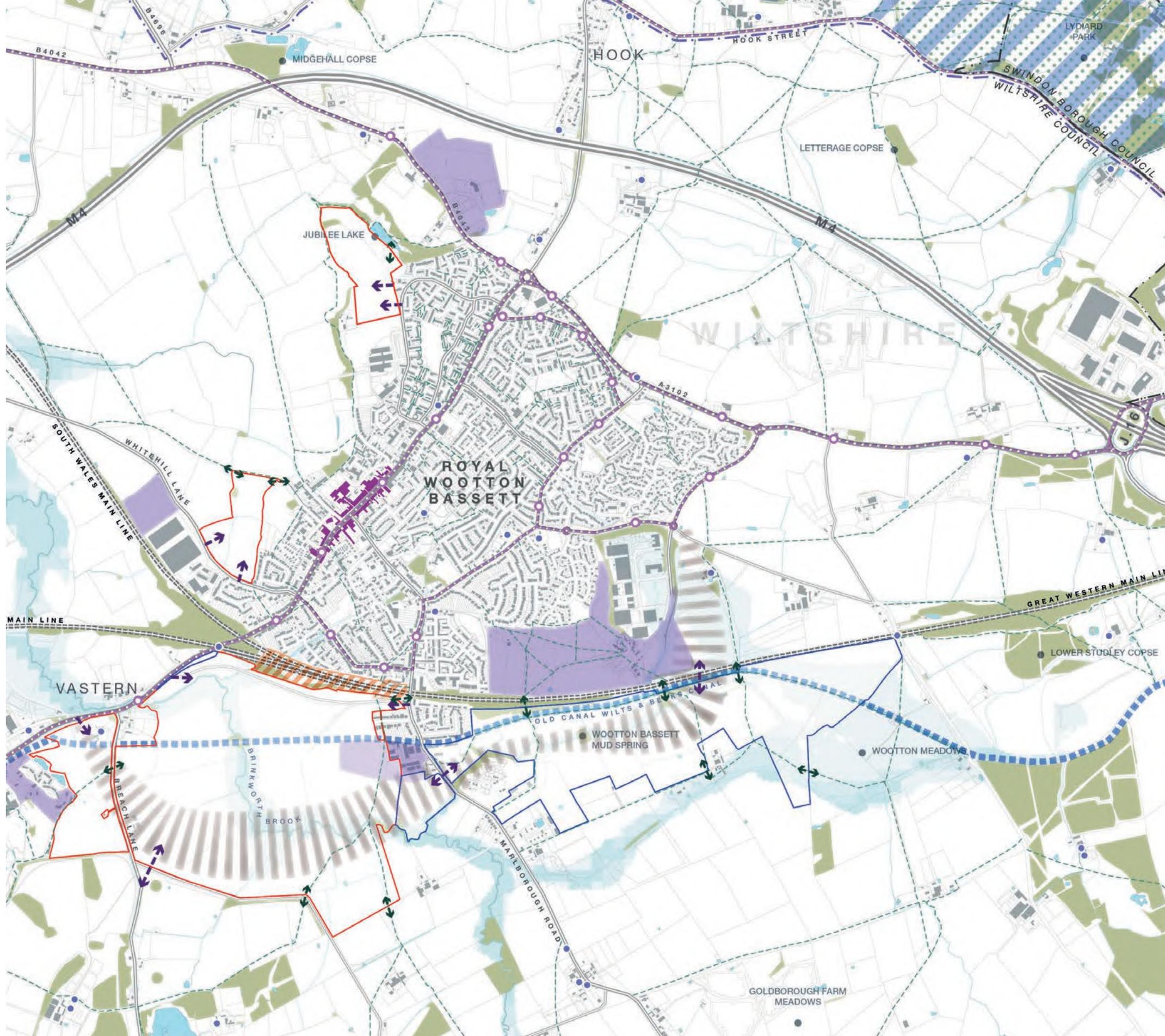
We are proposing that Land South of Royal Wootton Bassett would provide a new urban extension, linked to the existing town, but with its own character and identity, which integrates a new relief road, open space and supporting community facilities into the design.

STRATEGIC CONNECTIONS

Royal Wootton Bassett is already well connected to Swindon and the M4. In similarity with other towns in the area, a large number of people from Royal Wootton Bassett already commute to work in Swindon. Land South of Royal Wootton Bassett would aim to minimise traffic impacts on the existing network by providing services, education and employment areas within walking distances of new homes. Stagecoach bus services operate in close proximity to the site. These services could be improved and diverted through the site. Discussions with Stagecoach indicate that they support additional services to Swindon, providing the opportunity for residents, both existing and new, in Royal Wootton Bassett who commute by car to Swindon, to commute by bus instead.

Development to the South of Royal Wootton Bassett is the best location in order to minimise traffic impacts from largescale new development around the town. Travelling along the A3102 towards the M4 at peak times in a vehicle can be very slow, with congestion encountered around the B4042/A3102 roundabout to the north and the A3102 roundabout to the east. Development to the south would mean that new traffic heading towards Swindon and the M4 would not impact on the existing town centre, and instead use the new relief road to directly access the eastern A3102 roundabout.

-  Site Boundary
-  Existing development
-  Town Centre
-  Existing Allocations
-  Woodland
-  Waterbody / Watercourse
-  Public Right of Way
-  Bus Routes and Stops
-  Railway Line
-  Motorway
-  A-Road
-  B-Road
-  Minor Road
-  Canal Corridor
-  Potential Vehicular Access Points
-  New/Improved links to PROW Network
-  Relief Road Corridor (including new bus route and stops)



GREEN INFRASTRUCTURE

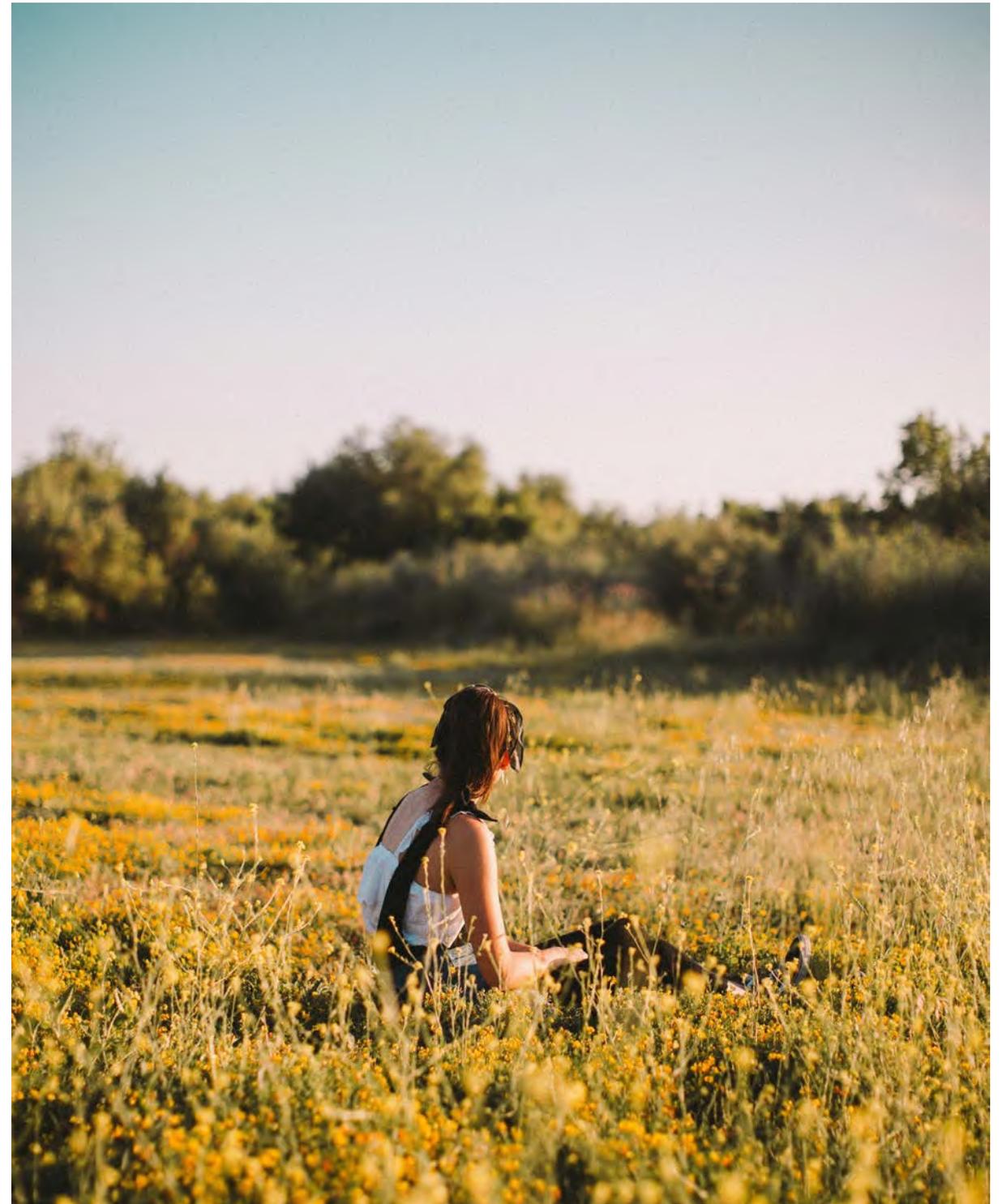
We understand the Town Council's drive to maintain a strategic green gap between Royal Wootton Bassett and Swindon.

In our over-arching strategic plan for the town, we show the following pieces of strategic green infrastructure:

- a green gap to the east and north-east,
- strategic planting & GI corridors to the west, and
- a network of strategic green spaces linking through the southern extension to the south of the town.

The GI network proposed will deliver:

- enhanced habitats and net biodiversity gain,
- natural green spaces enhancing the setting of the town,
- strategic parks and formal sports and recreation areas, and
- local networks of open space supporting health and wellbeing through local play, running and walking routes, dog walking and connections to the wider countryside.



-  Site Boundary
-  Other land within TOF ownership
-  Existing development
-  Woodland
-  Waterbody / Watercourse
-  Public Right of Way
-  Railway Line
-  Canal Corridor
-  Floodplain
-  School playing fields
-  Openspace
-  Registered Park and Garden
-  SSSI
-  Local Nature Reserve
-  Allotments
-  Green Corridors
-  Strategic Green Gap



ANALYSIS

An aerial photograph of a residential neighborhood, overlaid with a semi-transparent blue filter. The image shows a dense arrangement of houses, streets, and green spaces. A large, irregularly shaped area in the center-left is highlighted with a darker blue, suggesting a specific focus of analysis. The overall scene is a typical suburban or urban residential development.



THE SITES

ROYAL WOOTTON BASSETT

Royal Wootton Bassett is located approximately 6.5 miles south west of Swindon. It is a sustainable town with a vibrant centre, primary schools, a secondary school and a wide range of local community facilities and services.

It is located close to Junction 16 of the M4 Motorway with its associated employment areas at Blagrove, Windmill Hill and Lydiard Fields. Royal Wootton Bassett is defined as a market town in the Submitted Version of the Core Strategy. Core Policy One states that market towns have the potential for significant development that could increase employment and deliver homes. Royal Wootton Bassett is the closest market town to Swindon in Wiltshire.

SOUTHERN SITE (S-RWB)

The strategic urban extension lies to the south of Royal Wootton Bassett, south of the railway line. It is largely agricultural land and is sub-divided into a number of fields.

To the west of the site lies Hunt Mills Road, which is the main route through Wootton Bassett and connects to Swindon to the north-east and Lyneham and Chippenham to the south and south-west.

The Great Western Main Line railway runs immediately to the north of the site with residential areas of Royal Wootton Bassett town beyond.

Owing to the topography and since the northern boundary of the site (the railway lines) are below the ground level, there is a visual connection to Royal Wootton Bassett from the site, in addition to physical connections.

The eastern edge of the site, within the client's control is bound by the small residential area of Dunnington Road and the Templars Industrial Estate. The south-east and south of the site is surrounded by open countryside.

To the east of Marlborough Road and the Templars Industrial Estate is an area of agricultural land (outlined in blue on the plan opposite) within the control of Wiltshire Council and another third party land owner. Our proposals integrate the development of this area with the eastern parcel in order to facilitate the delivery of a relief road linking to the A3102 on either side of the town.

The route of the old Wilts and Berks Canal runs east-west through the northern part of the site. Although the old canal has been filled in, it is a distinctive feature on the site and its route is safeguarded as part of local policy to enable the canal to be reinstated in the future. The Brinkworth Brook runs through the site from north-west to south-east, with its associated floodplain.

MAPLE DRIVE

Land off of Maple Drive is located to the north-west of Royal Wootton Bassett, directly to the north of Royal Wootton Bassett Academy. The site is bordered by countryside to the west, north and north-east, with residential development around Lucerne Close to the east. Access to the site would be from Maple Drive/Showfield with a secondary access from Lucerne Close.

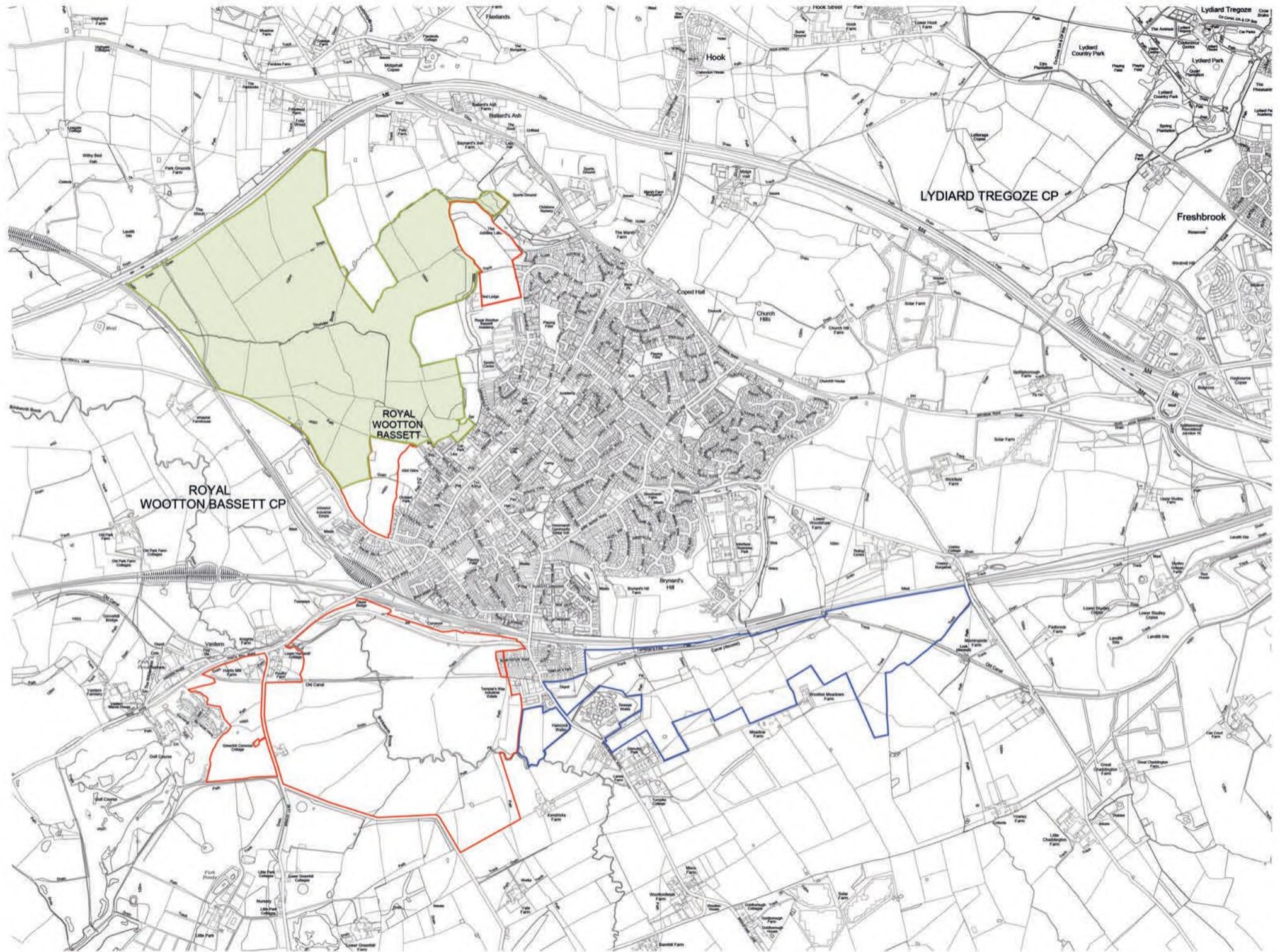
The site has the potential to provide up to 100 new residential units across 3ha alongside a new community campus within the southern part of the site (1.6ha). To the northern part of the site, an area of openspace could also provide a green link to Jubilee Lake and potential new connected routes along the western edge of the town.

WHITEHILL LANE

The site to the north of Whitehill Lane, consists of 8.8ha of agricultural land. To the east and south-east lies an area of residential development, with allotments to the north-east and open countryside to the north and west. Whitehill Lane forms the southern boundary and provides access to the site, with the existing Whitehill Industrial Estate further south.

There is an opportunity to extend the allotments into the site as well as forming a new area of public open space within the northern most parcel. This approach further extends the existing green network along the west of Royal Wootton Bassett, whilst also delivery up to 150 new homes within the southern part of the site, closest to existing development and employment.

-  Site Boundary (within TOF ownership)
-  Site Boundary (other ownership)
-  Other land within TOF ownership



MOVEMENT

ACCESS

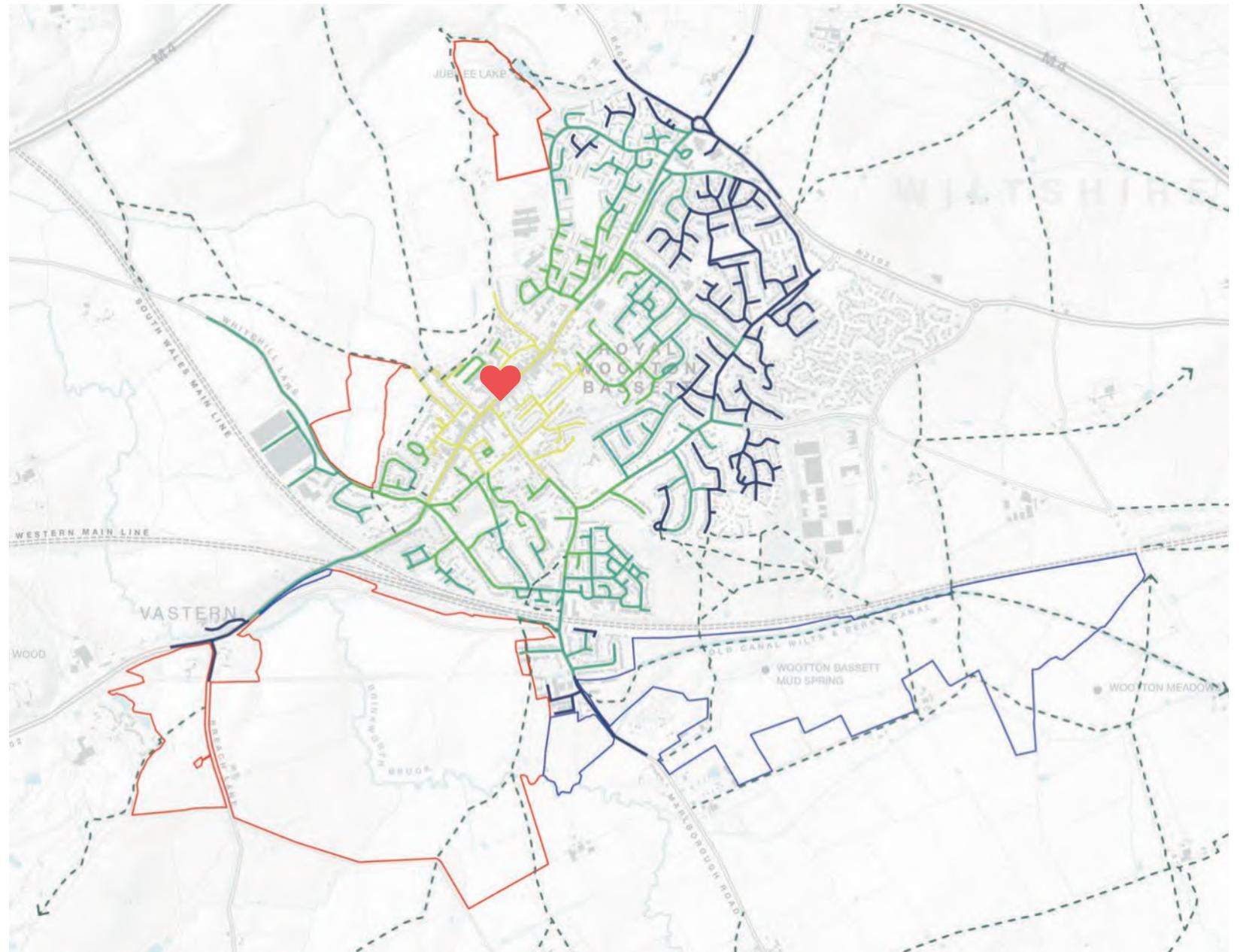
The strategic site is currently accessed from a 7.3 metre wide link road, which is now closed to general traffic. The link road was constructed as a temporary bypass whilst works were being undertaken on the railway bridge on Marlborough Road.

Between the link road and Wootton Bassett town centre there are two railway bridges. The south-western bridge is narrow with no footway, whilst the north-eastern bridge is slightly wider with a 1.2 metre wide footway.

PEDESTRIAN / CYCLE LINKS

There is significant opportunity to enhance pedestrian and cycle provision within the town to help achieve the potential shift in journeys to sustainable travel modes.

The site's location to the south of the town centre, with a walk time of 15-20 minutes from the main pedestrian access points means there is the potential for almost all internal trips to be undertaken on foot. This is comparable to the majority of the existing residential areas of the town which are within a 20 minute walk of the centre.



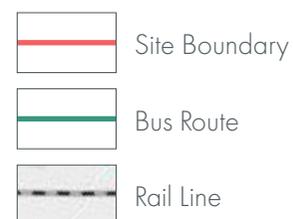
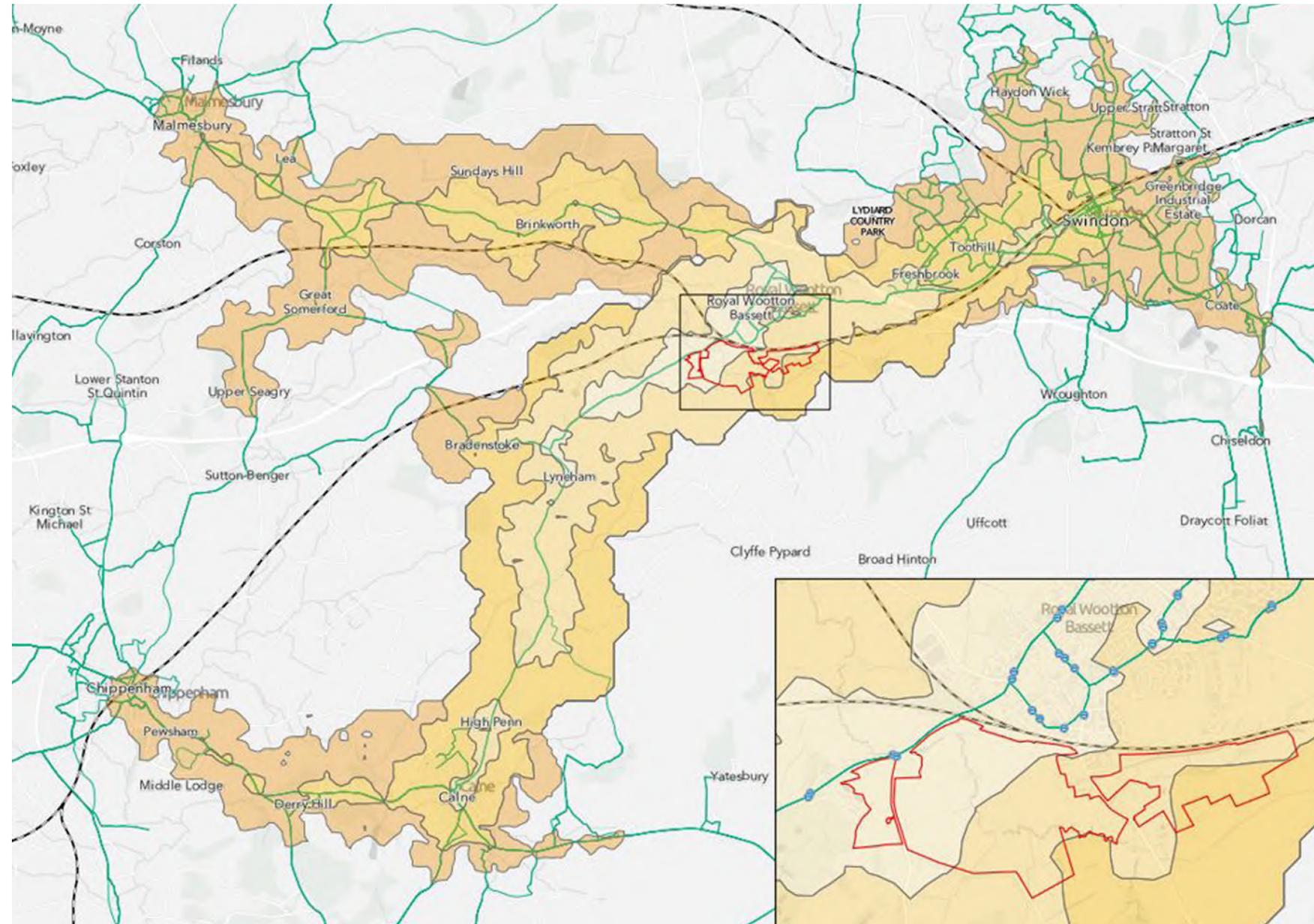
PUBLIC TRANSPORT

Royal Wootton Bassett benefits from existing good connections to Swindon. This public transport corridor is part of a wider series of links which connect to Chippenham and Calne. Ongoing discussions with Stagecoach have confirmed that they support the scheme and recognise the site's opportunity to minimise car dependency and promote a shift to sustainable modes of transport.

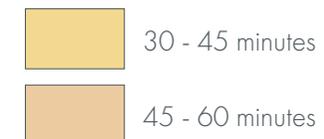
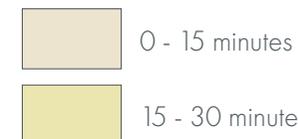
Analysis of the existing Public Transport Catchment shows that the site is located within 1 hour of 79,550 existing jobs, and the key retail centres in Swindon, Malmesbury, Calne and Chippenham.

RAIL CONNECTIONS

Royal Wootton Bassett does not currently have a Railway Station, however the development allows for the opportunity to safeguard land should this be something that is delivered in the future. The closest Railway Station is located approximately 11 km to the east of Royal Wootton Bassett in Swindon, which is accessible by bus in around 25 minutes.



Public Transport Accessibility Catchment (current): 7-9am



CONSTRAINTS AND OPPORTUNITIES

Following an extensive set of surveys and appraisals, the following conclusions have been drawn when considering the constraints and opportunities for the sites at Royal Wootton Bassett.

AGRICULTURE

Development of the predominantly clayey, slowly permeable and seasonally waterlogged agricultural land over mudstone (i.e., Denchworth Association) across the site is unlikely to harm national agricultural interests in terms of paragraphs 171 and 172 of the NPPF (2019), and relevant Development Plan policy in the Wiltshire Core Strategy (2015).

ABORICULTURE

An initial appraisal of the sites finds that there are no major issues, as far as existing trees are concerned, that affect the principle of development. The areas of mature tree cover at the boundaries will be safeguarded as part of further surveying and later detailed design work.

ECOLOGY

No significant ecological issues that could affect the principle of development of the sites have been identified. Those valuable ecological resources that exist, or could exist, within the sites could be accommodated by the adoption of appropriate design principles.

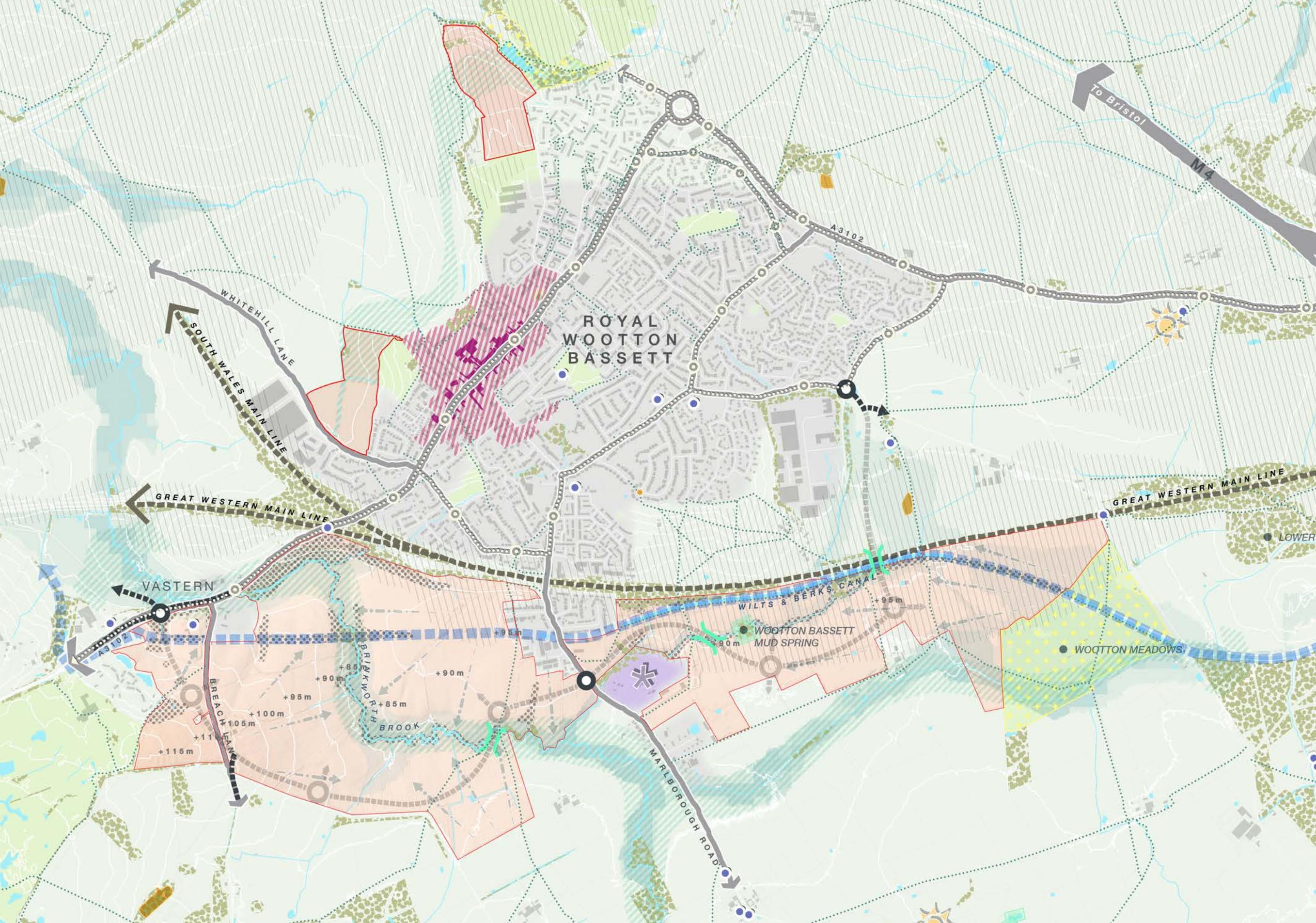
HERITAGE

There are no heritage issues that would affect the principle or quantum of development. There is every reason to expect that allocation and future development of the sites could accord with relevant planning policy and legislation that seeks to protect and enhance heritage resources and their settings.

LANDSCAPE

Overall, there is potential for the site to accommodate development provided an appropriate landscape strategy is followed. There is an opportunity to locate development parcels within a strong GI network which incorporates non-vehicular connectivity, riparian features and new trees, hedgerows and woodland.

-  Site Boundary
-  Existing development
-  Woodland
-  Waterbody / Watercourse
-  Public Right of Way
-  Railway Line
-  Canal Corridor
-  Floodplain
-  Topography Analysis
-  Direction of Slope
-  Steep Slopes
-  Openspace
-  SSSI
-  Listed Building
-  Local Nature Reserve
-  Green Corridors
-  Relief Road Alignment
-  Solar Farm
-  Sewage Treatment Works



ROYAL
WOOTTON
BASSETT

VASTERN

WOOTTON BASSETT
MUD SPRING

WOOTTON MEADOWS

BREACH LANE

BRINKWORTH
BROOK

MARLBOROUGH ROAD

WHITEHILL LANE

SOUTH WALES MAIN LINE

GREAT WESTERN MAIN LINE

GREAT WESTERN MAIN LINE

To Bristol

M4

A3102

LOWER

OPPORTUNITIES

There are a variety of opportunities that arise from development to the south of Royal Wootton Bassett. We have therefore subdivided them into social, environmental, economic and transport benefits, set out of the next few pages.

SOCIAL OPPORTUNITIES

- Support for improvements to the existing town centre including:
 - Opportunities to improve the public realm through the reduction of vehicular traffic
 - Additional services and facilities
 - Improvements to leisure facilities
 - provision of new pedestrian and cycle links that tie in with the existing network for recreational use
- A new local community hub providing opportunities for:
 - Health care facilities
 - New shops
 - Restaurant / café
- New primary schools
- New leisure and sporting facilities
- Extensive green spaces including:
 - Local parks and greens creating a strong network of green space, benefiting health and wellbeing
 - Strategic sports provision, including formal pitches and a pavilion
 - Creation of new habitats and natural green space
 - Allotments , community orchards and edible streets
- New affordable housing provided for the growing Royal Wootton Bassett community



ENVIRONMENTAL OPPORTUNITIES

- Large areas of open space offering extensive opportunities for new habitat creation
- Retention and integration of existing landscape features, retaining existing habitats
- Opportunity to provide biodiversity net gain
- New habitats created through surface water features and natural parkland
- Minimising the impact of growth on traffic levels through strategic infrastructure provision, and the increased self-containment of a larger town
- Allotments and orchards creating diverse landscape and wildlife features
- Opportunities for edible streets and healthy living initiatives
- Opportunities for low carbon housing and employment
- Networks of local green links supporting active movement routes encouraging healthy living
- Ensure protection of designated sites and protected species within the proposals



ECONOMIC OPPORTUNITIES

- Employment opportunities including:
 - Mixed use local community hub centre
 - Working from home
 - Potential work hub including flexible shared work space integrated with other community facilities
 - Starter units and grow-on space for new businesses
 - Office space
 - Extension to existing employment area off Marlborough Road
- Local employment scheme offering construction jobs
- Potential increased support to existing town centre uses from additional local spending from new residents



TRANSPORT AND CONNECTIVITY OPPORTUNITIES

- New cycle and pedestrian connections to Royal Wootton Bassett and the wider countryside network
- A network of green spaces providing safe, off road cycle routes with access to new and existing employment
- Extension / improvement to existing bus services with new bus stops
- Provision for a relief road from the A3102 to the east and west of the town centre, to alleviate vehicle congestion within the town centre, improving the character and pedestrian friendliness of the high street





S-RWB VISION

MASTERPLAN

Our vision is to create a new sustainable extension to Royal Wootton Bassett that complements and integrates with the existing town, helping it to grow and improve for both new and existing residents. Providing new infrastructure which encourages the existing town centre retail to thrive, whilst delivering new employment opportunities within walkable and cycling distance to new homes.

This is an emerging proposal. It has been informed through examination of local issues, Wiltshire Council plans for Royal Wootton Bassett, traffic and transport analysis, and an examination of the opportunities that this site offers.

Emerging from the analysis to date, and the identification of a large number of benefits that this site offers, are a number of key development principles that will shape our proposals:

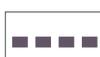
- create a pair of walkable neighbourhoods that work together to provide a wide range of facilities for the residents of Royal Wootton Bassett, including leisure and employment;
- provide new sustainable walking and cycling links to the town centre;
- integrate existing local green links to the scheme whilst opening up opportunities to access to new areas of open space; and
- integrate strategic and local green infrastructure to provide a healthy environment for all.

The wider site comprises an area of some 200+ ha. This is suitable to provide a substantial number of new homes over time, together with supporting infrastructure.

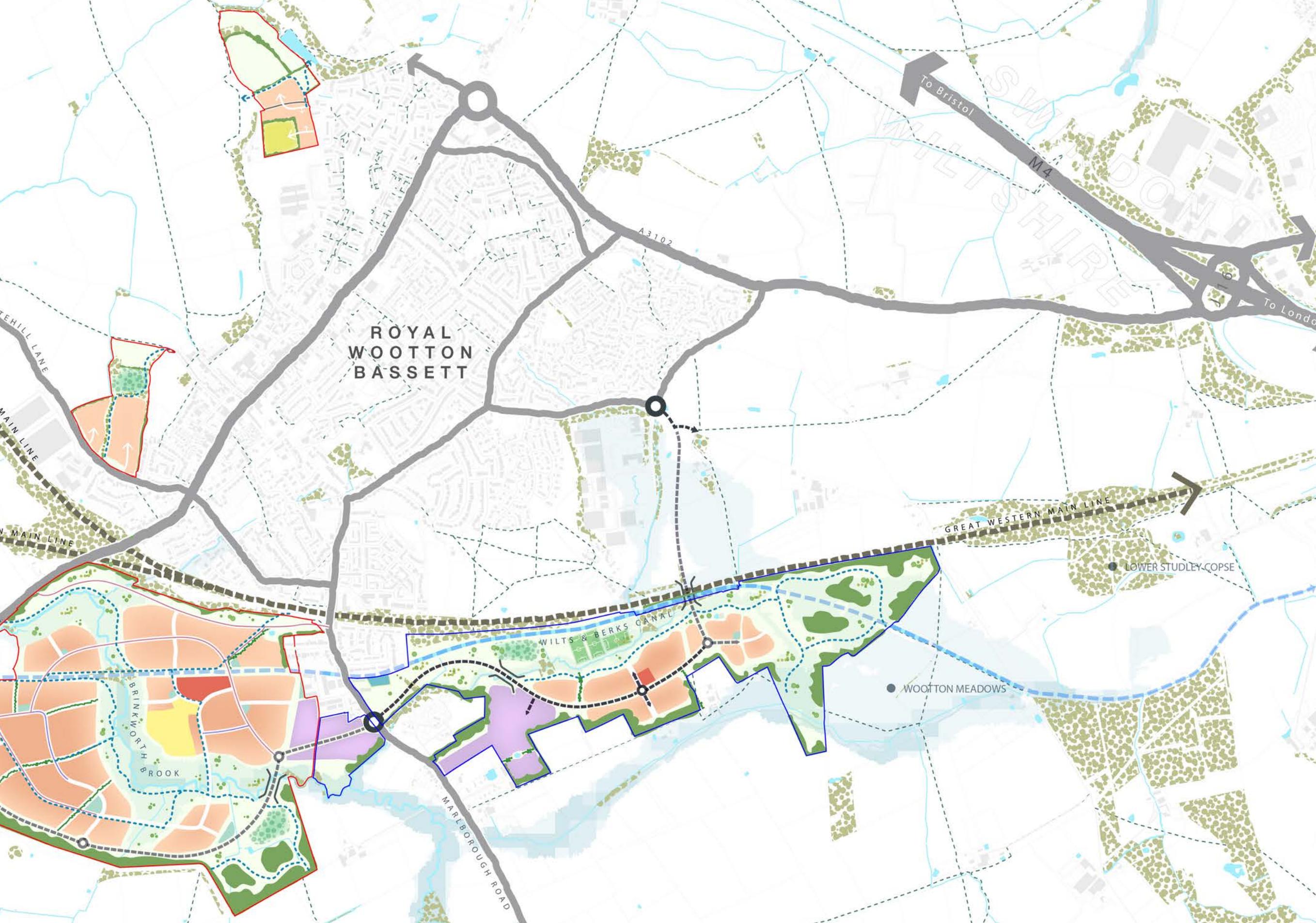
Our draft framework shows the following land uses:

Schedule	Area (hectares)
Residential	65ha
Employment	11ha
Education	3.2ha
Local Centre	1.5ha
Total site area	210.6ha

This equates to a development of which 38% of the land is dedicated to green spaces. It would also provide associated primary and secondary schools, a significant amount of employment, and about 2,200 - 2,500 homes, depending on the densities at which they are constructed.

-  Site Boundary
-  Existing development
-  Existing road network
-  Woodland
-  Safeguarded canal route
-  Waterbody/Watercourse
-  Railway Line
-  Public Right of Way
-  Strategic Bridges
-  Proposed Road Alignment
-  Floodplain
-  Pedestrian/cycle routes
-  Residential
-  2.5 Form Entry Primary School
-  Employment
-  Local Centre
-  Sports Pitches
-  Community Orchards/Allotments
-  Hedgerows
-  Boundary Planting





ROYAL
WOOTTON
BASSETT

A3102

GREAT WESTERN MAIN LINE

To Bristol

M4

To London

WILTS & BERKS CANAL

MARLBOROUGH ROAD

● LOWER STUDLEY COPSE

● WOOTTON MEADOWS

BRINKWORTH &
BROOK

TEHILL LANE

MAIN LINE

MAIN LINE

MAPLE DRIVE

MASTERPLAN

Land off Maple Drive comprises an area of 5.2ha. This is suitable to provide a substantial number of new homes over time, together with supporting infrastructure.

Our draft framework shows the following land uses:

Schedule	Area (hectares)
Residential	3ha
Public Openspace	0.6ha
Land for Recreational Facilities	1.6ha
Total site area	10.7ha

Our analysis of the site and its associated constraints, we are proposing 110 new homes, with a new access point from Maple Drive, with a secondary access point locate on Lucerne Close.

In the southern part of the site, adjacent to the Royal Wootton Bassett Academy, an area has been safeguarded for potential recreational facilities with associated parking.

Within the north-eastern part of the site, an area of public openspace is proposed which would link with the existing Local Nature Reserve. New pedestrian and cycle links would be provided to link into the wider Public Right of Way network.

-  Site Boundary
-  Existing development
-  Existing Access through the site (to be retained in-situ)
-  Woodland
-  Waterbody/Watercourse
-  Public Right of Way
-  Proposed Residential
-  Proposed Access
-  Proposed Recreational Facilities
-  Proposed Public Openspace
-  Pedestrian / Cycle routes
-  Planting buffer



WHITEHILL LANE

MASTERPLAN

Land North of Whitehill Lane comprises an area of 8.8ha. It is located to the west of existing residential development, and shares an eastern boundary with Church Street Allotments.

There is an opportunity to extend the allotments into the site as well as forming a new area of public open space within the northern most parcel.

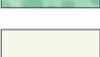
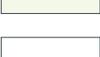
Our draft framework shows the following land uses:

Schedule	Area (hectares)
Residential	5.1ha
Employment	1.8ha
Education	1.7ha
Planting/Strategic Openspace	
Total site area	8.8ha

Based on our analysis of the site and its constraints we are proposing 150 new homes in the southern part of the site, closest to Whitehill Lane and the existing residential development.

In the central part of the site, beyond the existing tree belt, our proposals include an extension of Church Street Allotments with associated parking (approximately 20 spaces) for allotment users.

Within the northern most part of the site, a substantial area of new public open space is proposed, with a footpath connection to Church Street and the town centre beyond.

-  Site Boundary
-  Existing development
-  Existing Road Network
-  Woodland
-  Waterbody/Watercourse
-  Public Right of Way
-  Proposed Residential
-  Proposed Access
-  Proposed Extension to Allotments
-  Proposed Public Openspace
-  Pedestrian / Cycle routes
-  Planting buffer



MOVEMENT

RELIEF ROAD DESIGN

The delivery of a new southern relief road for Royal Wootton Bassett offers significant benefits to the existing town centre by removing significant volumes of vehicular traffic, in particular HGV movements from the A3102.

A preliminary design for the relief road has been prepared by Phil Jones Associates based on the following principles:

- provision of a 7.3m carriageway;
- designed to a 40mph speed limit;
- provision of a new roundabout at the junction with the A3102;
- inclusion of a new roundabout at the junction with Marlborough Road; and
- a number of roundabouts along the route to provide access to the development parcels.

Modeling undertaken to-date has shown that a new link road would reduce journey times for a number of key routes, which has the potential to redirect traffic away from the town centre. This could result in a reduction of 65% of vehicle traffic that does not stop in town during peak AM times and a 68% reduction in PM peak times.

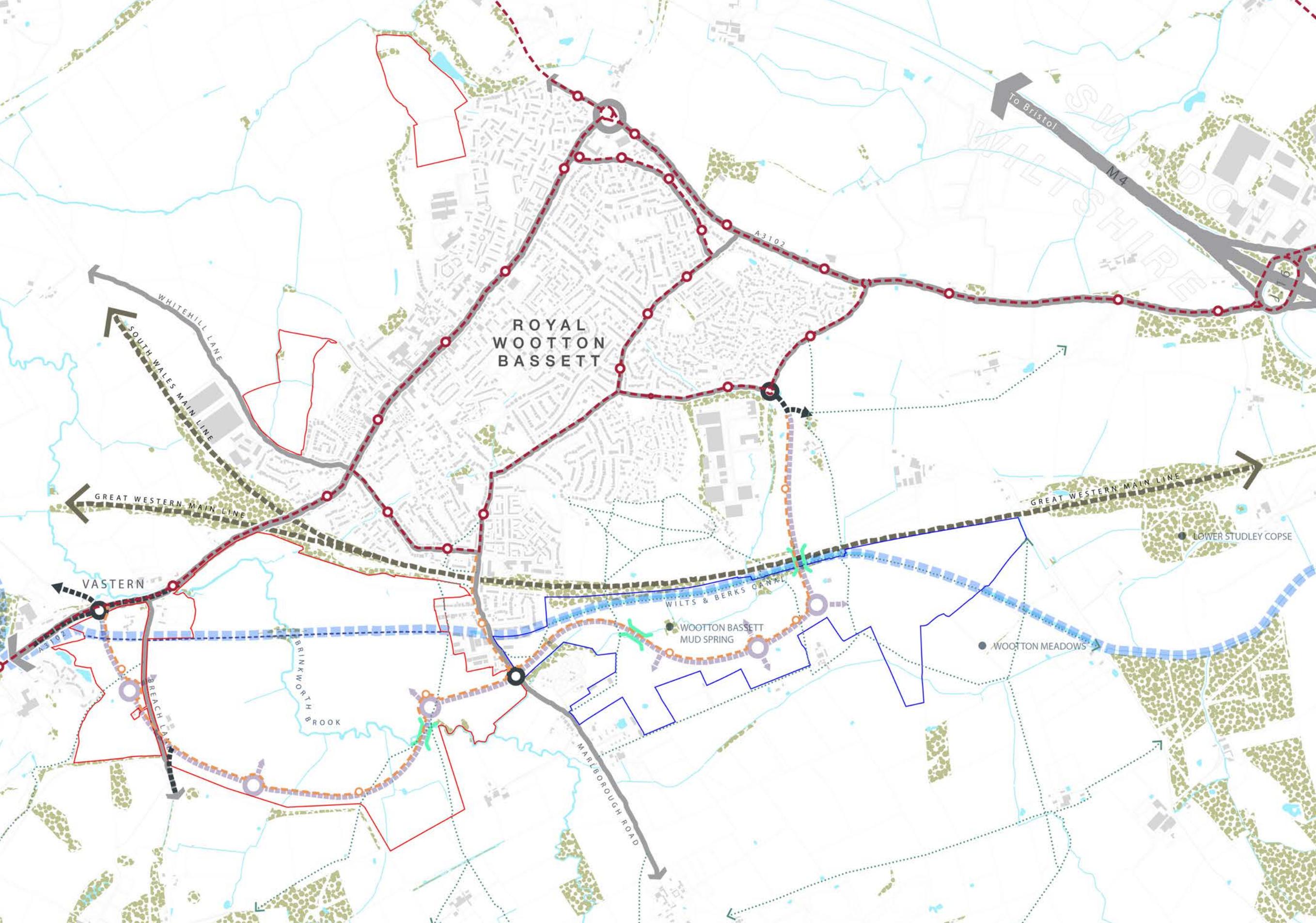
This equates to a total reduction of 21% of vehicle traffic during peak AM traffic and 23% less vehicles during PM peaks. In total that is 4,600 vehicle trips per day.

BENEFITS

The key benefits associated with the provision of the link road would include:

- Reduced journey times for those currently routing through RWB.
- Reduced vehicle flows through RWB town centre, offering the opportunity for public realm improvements or the installation of traffic calming to further reduce speeds and decrease the attractiveness of this route for motor vehicles.
- Improved air quality within RWB town centre.
- Reduced potential for collisions in RWB town centre.
- Reduction in traffic noise in RWB town centre.
- Growth of the town through employment and housing development, which would help support local services and amenities.
- Improved access to / from the M4 via junction 16.
- The ability to facilitate development without exacerbating existing congestion issues within the town.





ROYAL
WOOTTON
BASSETT

To Bristol
M4

WHITEHILL LANE
SOUTH WALES MAIN LINE

GREAT WESTERN MAIN LINE

VASTERN

GREAT WESTERN MAIN LINE

LOWER STUDLEY COPSE

WILTS & BERKS CANAL
WOOTTON BASSETT
MUD SPRING

WOOTTON MEADOWS

BRINKWORTH
BROOK

MARLBOROUGH ROAD

A3102

A3103

BREACH LANE

PUBLIC TRANSPORT

There are a number of bus routes that travel through Royal Wootton Bassett, some of these could be redirected through the site, with additional bus stops at key locations along the relief road to serve the new development.

Discussions with Stagecoach, who operate the existing bus services, have confirmed their support for the scheme and recognise the opportunity to minimise car dependency which would benefit both existing and future residents of the town. Provision of an increased service (up to every 15 minutes) to/from Swindon would be possible due to the proposed scale of the development, with additional opportunities to widen the service to other destinations, furthering the potential for modal shift away from private vehicle usage.

Other potential bus improvements could include:

- a bus gate at Marlborough Road, closing the road to traffic, except buses, cyclists and pedestrians. This would improve the environment of Marlborough Road for existing and new residents and reinforce the proposed relief road; and
- Priority bus improvements along the A3102 on the M4 approach to Junction 16.

PEDESTRIAN AND CYCLE LINKS

New cycle / footpaths would be provided throughout the scheme, connecting to the key north south and east-west routes, and other links. Direct routes would be provided so that residents can quickly and easily accessing facilities and services, with more leisurely countryside routes integrated within the openspace network for a variety of uses, including dog walking, country walks, and potential for marked out 5k and 10k running routes.

Along the route of the relief road, provision will be made for a segregated cycle and pedestrian route.

Additionally, secure parking options will be provided within dwellings and at destinations within the site for cycles and scooters. These would be further supported by the inclusion of a travel hub within the larger local centre on the western part of the site, which could include:

- electric vehicle and e-bike charging stations;
- Pop-up cycle repairs / cycle shop;
- opportunities for wireless vehicle charging;
- smart parking solutions;
- supporting infrastructure for automated and connected vehicles; and
- car clubs / e-bike and scooter hire services.



In addition to new routes and improvements to existing on-site connections, there are opportunities to improve existing active travel routes off site to help encourage walking and cycling access to the town centre. These include, but are not limited to:

- New direction signage to encourage vehicles to use the new relief road;
- Additional cycle parking in the town centre, with a potential reduction in on-street parking spaces;
- The continuation of footways across side roads;
- Improvements to pedestrian crossing facilities;
- Potential new signalised system across existing bridges to allow for a new footway;
- Potential speed reduction around western site access;
- Potential surface improvements to footways on New Road and Station Road;
- Potential modal filter at Marlborough bridge to restrict private car access;
- Improved signage for shared use paths;
- Removal of guard rails and better signage within the town centre;
- Widening of existing footpaths to allow for shared usage by pedestrians and cyclists;
- Speed reductions within the town centre; and
- Public realm improvements to the town centre, including additional planting, street furniture and the creation of space for outdoor seating for cafes and restaurants.



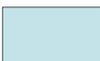
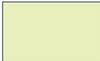
GREEN INFRASTRUCTURE

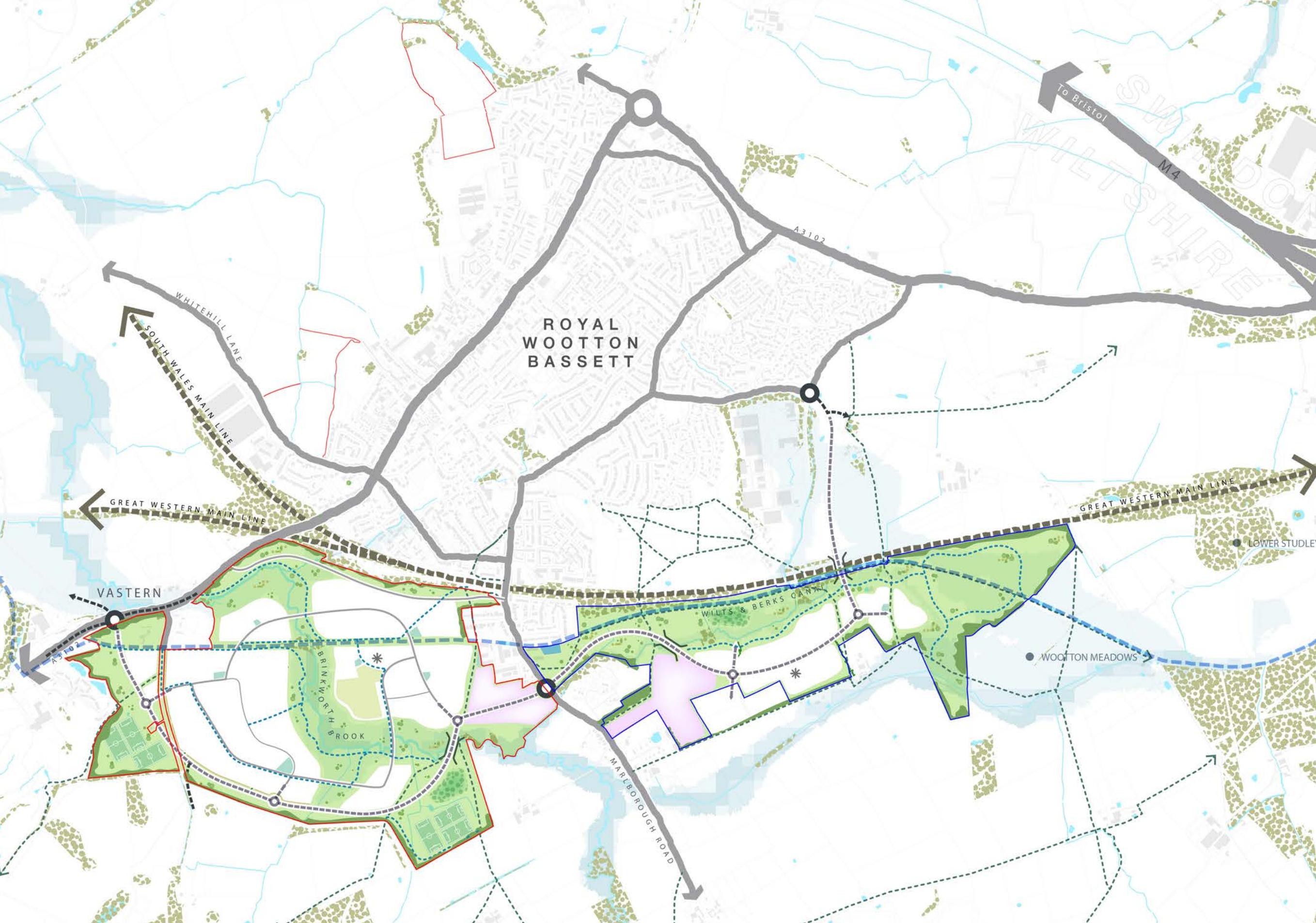
The Green Infrastructure Strategy will seek to retain as much of the existing green infrastructure within the sites as possible and to enhance vegetation within the established hedgerows.

In order to create a varied, rich and interconnected series of green and blue (aquatic) spaces, our proposals will deliver a variety of different landscapes across the three sites, including:

- **Brook Corridor Park:** running through the central part of the southern strategic site and continuing along the canal route to the east;
- **Allotments and Orchards:** New community orchards and allotments will be provided within the strategic site, alongside the extension of the Church Lane allotments to the West of Royal Wootton Bassatt;
- **Sustainable Urban Drainage:** these areas could provide a range of habitats for local wildlife, whilst also providing an attractive setting for leisure walks for new and existing residents;
- **New Boundary/Copse Planting:** proposals will include the provision of new areas of planting along the Eastern, Southern and Western boundaries of the strategic site, in accordance with landscape character guidelines, to soften potential views into the development from the AONB and wider countryside;
- **Amenity Space:** A network of neighbourhood greens providing focal spaces and for children's play and community leisure;

- **Canal Corridor:** improvements to the character and setting along the safeguarded route of the canal, including habitat improvements and a new towpath;
- **Formal sports pitches:** one to the west and one to the east of the southern strategic site;
- **Green/Edible Streets:** Opportunities to provide Green streets and edible streets;
- **Wootton Bassett Mud Springs SSSI:** consideration will be given to the existing SSSI area within the site in order to protect and enhance this valuable feature;
- **Heritage Landscape Areas:** Parts of the southern strategic site include areas with remnant ridge, where possible these areas will be retained within public open space to preserve some of the landscape heritage of the site.
- **Delivering Quality landscapes:** Designing and delivering exemplar landscape areas that go beyond minimum requirements, potentially working toward Building with Nation Accreditation.

	Site Boundary
	Existing development
	Existing road network
	Woodland
	Safeguarded canal route
	Waterbody/Watercourse
	Railway Line
	Public Right of Way
	Strategic Bridges
	Proposed Road Alignment
	Floodplain
	Pedestrian/cycle routes
	Primary School Fields
	Employment
	Local Centre
	Sports Pitches
	Community Orchards/Allotments
	Hedgerows
	Boundary/Copse Planting



ROYAL
WOOTTON
BASSETT

To Bristol
M4

WHITEHILL LANE
SOUTH WALES MAIN LINE

GREAT WESTERN MAIN LINE

GREAT WESTERN MAIN LINE

VASTERN

BRINKWORTH
BROOK

WILTS & BERKS CANAL

WOOTTON MEADOWS

LOWER STUDLE

MARLBOROUGH ROAD

A3102

A3102

BLUE/GREEN CORRIDOR PARK

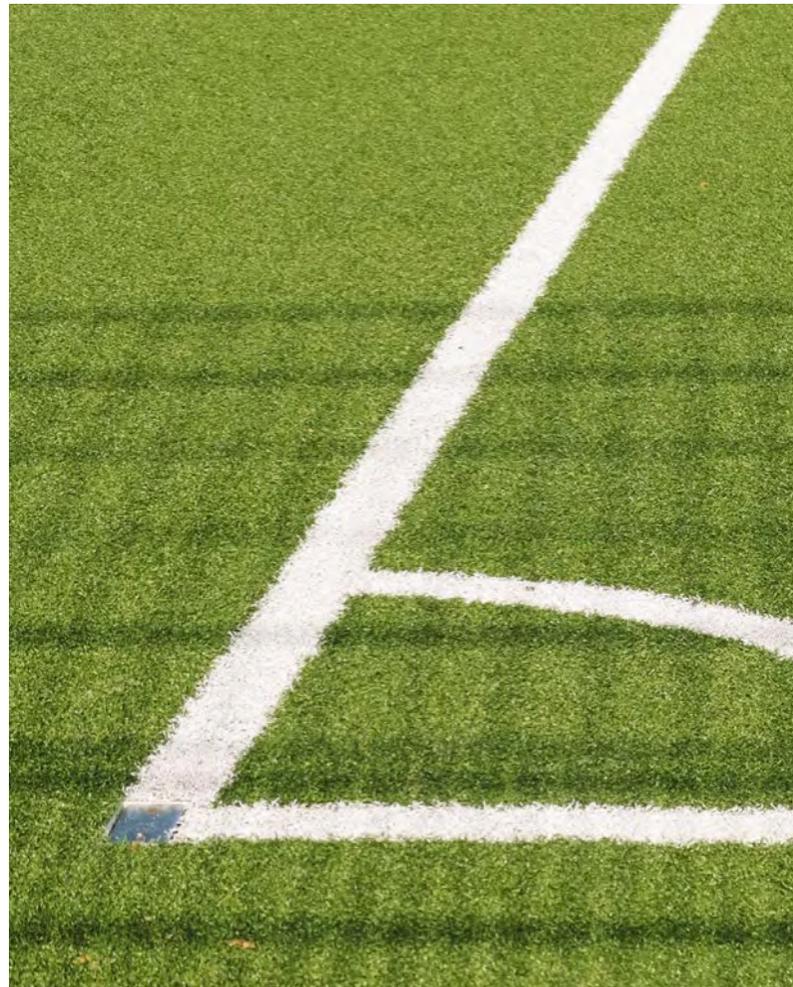
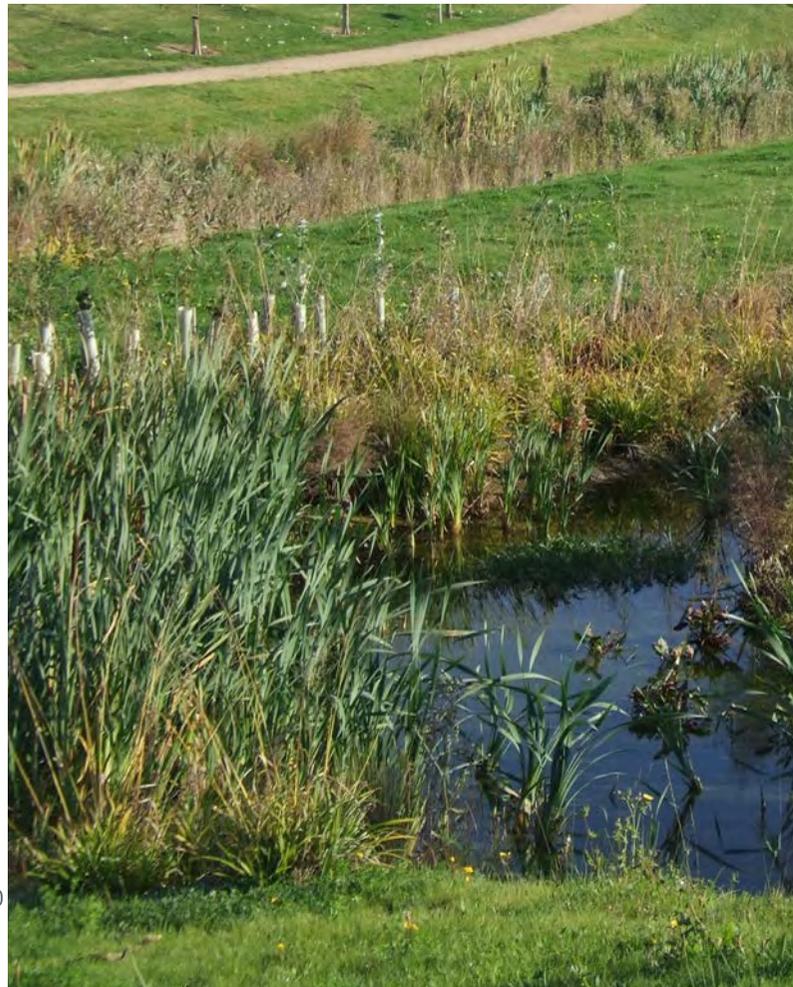
Focused around the central stream corridor that run through both sides of the site, this large area of openspace would include areas for sustainable drainage ponds that slow the discharge of water when there are heavy storm events. The creation of these ponds also provides the opportunity to establish new habitats areas, including new semi-wetland areas. Cycle/footpaths would meander through the park, providing opportunities for walking and running routes, with areas for natural play and education.

SPORTS PROVISION

Within the strategic site, formal sports pitches will be delivered alongside natural and amenity spaces, encouraging a multi-use landscape that is in accordance with Wiltshire Open Space Standards.

NEIGHBOURHOOD GREENSPACES

Outdoor spaces will occupy a significant proportion of the Garden Village and will be available for exercise and relaxation, they will meet accessibility standards and cater for all levels of mobility and age. They will support community well-being and reconnect people with natural environments.



ORCHARDS / ALLOTMENTS

In addition to the expansion of the allotments at Whitehill lane, Land South of Royal Wootton Bassett will deliver a number of allotments and community orchards in addition to edible streets. These provide opportunities for engagement with school children and residents in healthy food production both formally and informally, and the potential to support or local food markets.



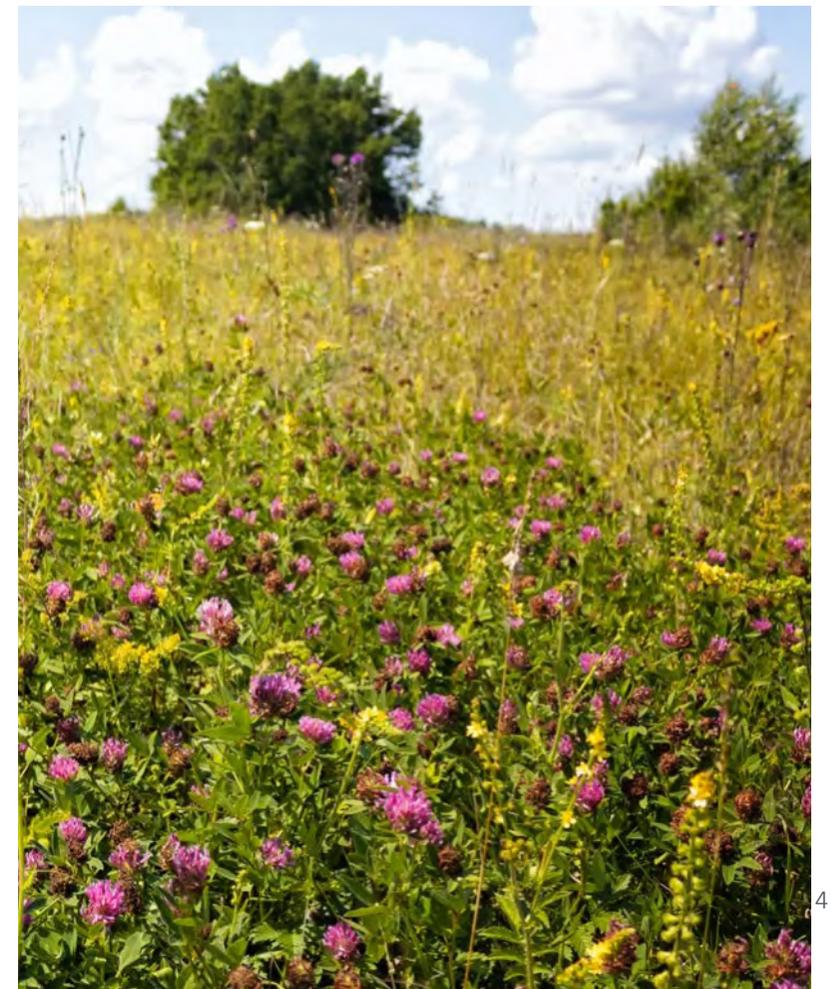
EDIBLE STREETSCAPES

Street trees will be integrated within the development in accordance with emerging guidance. This includes the potential for 'edible' streets, comprising a variety of fruit trees and herb beds that can be picked by residents and visitors. The edible streets would form links between green spaces throughout the site .



BIODIVERSITY NET GAIN AND HABITAT IMPROVEMENTS

Opportunities to enhance existing habitats and to create new habitats that will be visually attractive and encourage wildlife and which can be enjoyed by residents, workers and visitors and deliver net biodiversity gain.



BENEFITS

A vibrant outdoor festival scene. In the foreground, a person with blonde hair, wearing a red halter-neck dress and a floral headband, is seen from behind. To their right, another person is wearing a blue and red sequined top. In the background, a large, diverse crowd of people is gathered on a grassy field under a bright sky. A person in a dark hoodie is visible on the left side of the frame. The overall atmosphere is festive and lively.



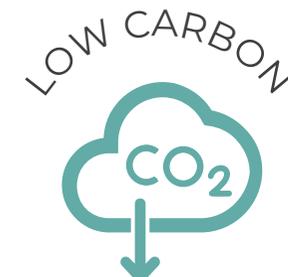
HEALTH AND WELLBEING

- Reduction in town centre traffic improves air quality
- Green networks, new cycle and walking links encourage active travel
- Improvements to public transport encourage active lifestyles
- New community hub increases social cohesion
- New health facilities provide local care and advice
- Links to existing town retain to strong sense of identity
- Out-commuting reduced, improving involvement in community activities
- Public streets and spaces designed to encourage interaction
- Opportunities for traffic calming to encourage greater active travel and improve highway safety



ENVIRONMENT

- New employment and facilities encourages less out-commuting
- Carbon emissions from travel by car reduced
- Carbon emissions by journey length reduced
- New local and strategic green spaces created
- Extensive open spaces for leisure and recreation
- Opportunities to provide access to a new open space network linking the sites via green routes to the existing town centre
- Town boundary park
- Protecting important environmental features such as designated sites and protected species



SOCIO-ECONOMIC

- Additional employment improves self-containment for town
- Local jobs provide employment opportunities
- Proximity to Swindon reduces travel to existing employment
- New supermarket provides choice and encourages local shopping
- New leisure and recreation opportunities
- New district centre and 2.5 forms of entry primary school



TRANSPORT

- Congestion in town centre decreased
- Opportunities for public transport improved
- Links between existing and new facilities created
- Walking and cycling enhanced
- Longer distance walking and running routes created



RWB56c



Savills

Land South of Royal Wootton Bassett

Transport Strategy

March 2021

Project Code: 04028

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I Introduction and Executive Summary

I.1 Purpose of Report

1.1.1 PJA has been commissioned by Savills to provide transport advice in relation to the promotion of land to the south of Royal Wootton Bassett (RWB) for a residential led development within the emerging Wiltshire Local Plan Review.

I.2 Executive Summary

1.2.1 A Transport Strategy has been devised in relation to the promotion of land to the south of RWB for a residential led development within the emerging Wiltshire Local Plan Review.

1.2.2 This Transport Strategy has demonstrated that:

- The development proposals would the vision and policies within Wiltshire Council's Local Plan Review documents.
- The proposed mix of development on the site will complement and strengthen the existing town, providing significant opportunities for trips to be internalised within the development and also contained within the town.
- The provision of a new road linking the A3102 Hunts Mill Road to the west with Bincknoll Lane to the east, will offer significant benefits to RWB as a whole by removing significant traffic volumes and particularly HGV movements from the town centre.

- There is significant opportunity to enhance pedestrian and cycle provision within the town to help achieve the potential shift in journeys to sustainable travel modes.
- There is potential for a new cycle path to be installed along the route of the canal to connect into the Wichelstowe cycle provision.
- Stagecoach have confirmed 'in principle' support for the scheme and recognises the opportunities to minimise car dependence and develop a suitable public transport strategy that would benefit both existing and future residents of the town.
- A package of bus priority measures can be delivered, which will increase the attractiveness of bus services particularly between RWB and Swindon and encourage modal shift away from private vehicles.
- The active travel and public transport improvements between RWB and Swindon will reduce the number of private vehicle movements through M4 J16, helping to mitigate the impact of development in this location.
- The development offers an opportunity to fully embed sustainable travel pattern and reduced car ownership amongst new residents though the provision of measures such as on-demand e-bike, cargo bike and e-scooter hire, car clubs and active travel corridors that prioritise journeys by sustainable modes.



- 1.2.3 Based on the conclusions of this transport strategy appraisal, the site would represent a suitable location for future residential led development from a transport perspective and should be promoted as part of the emerging Wiltshire Local Plan Review.



2 Policy Background

Wiltshire Council's Local Plan Review 'Site Selection Report for Royal Wootton Bassett', January 2021

- 2.1.1 The site is referred to in the Wiltshire Council's Local Plan Review Site Selection Report for Royal Wootton Bassett, January 2021, as SHELAA References 462, 463, 498 and 3156.
- 2.1.2 SHELAA sites 462 and 463, Land south of Wootton Bassett Parts A and B, have both been categorised for having low (green) traffic impact on the local highway network and medium accessibility (amber). However, because the development site has the potential to deliver 6ha employment space, a primary school, a district centre including a supermarket, health facilities, community uses and shops, there is an opportunity to address any issues in relation to local accessibility within the scheme itself. As set out in subsequent sections there will also be significant enhancements to routes connecting the site with wider facilities in RWB further improving accessibility.
- 2.1.3 SHELAA site 498, Templars Way Industrial Way, may be more suitable to employment use rather than housing, and has scored highly on accessibility (green) and for having medium (amber) traffic impact on the local highway network hence the traffic generated by the site is not anticipated to cause unacceptable degree of harm and

worsen congestion in the area. Indeed, it is stated that the site is not close to a congested corridor. The proposed development will also provide a significant betterment to travel patterns within RWB through the provision of a southern bypass for the town as set out later in this document.

- 2.1.4 SHELAA site 3156, Land south of Wootton Bassett, has been categorised as having a low (green) impact on traffic and medium accessibility (amber). However, as mentioned above, the development site has the potential to deliver 6ha employment space, a primary school, a district centre including a supermarket, health facilities, community uses and shops, alongside enhanced connections to existing facilities in RWB and therefore would have excellent local accessibility once fully built out.

Wiltshire Council's Local Plan 'Looking to the Future, Planning for Royal Wootton Bassett', January 2021

- 2.1.5 The Wiltshire Council's Local Plan 'Looking to the Future, Planning for Royal Wootton Bassett', January 2021, document refers to draft priorities for RWB on p5, which include:
- Maintaining capacity at M4 J16 throughout the Plan period.



Policy Background

- Maximising the use and availability of sustainable modes of transport along with managing levels of congestion on strategic routes and in the town centre.
- Safeguarding land for a Swindon Parkway station.
- Provision of additional employment to improve self-containment.
- Infrastructure improvements to promote and encourage non-car travel.
- Increased primary education and GP capacity.
- Safeguarding the historic alignment of the Wilts and Berks Canal and taking forward canal restoration.

2.1.6 All of the above priorities would be addressed through the promotion of land to the south of RWB as set out in the following sections.

2.1.7 Transport is referenced on p12, where it states that opportunities exist for future development to provide a southern bypass of the town, which this site could deliver, to reduce traffic congestion and impact of HGV traffic on the local road network especially through the town centre. This objective is fully supported by the proposed scheme.

2.1.8 Consultation with Stagecoach has already been undertaken to discuss how best bus service could serve the site, RWB town centre and Swindon, as well as discussion of bus priority along the A3102 towards M4 J16, which would improve bus links in the area and encourage modal shift to alleviate traffic congestion at M4 J16.

Wiltshire Council’s Local Plan ‘Looking to the Future. Emerging Spatial Strategy’, January 2021

2.1.9 Wiltshire Council’s Local Plan ‘Looking to the Future, Emerging Spatial Strategy’, January 2021, document states: *“The Local Plan Review will play a key role in helping to deliver not only the Council’s carbon reduction aspiration, but also achieving compliance with legislation and national planning policy expectations regarding climate change.”*

2.1.10 With respect to climate change, focusing new development within the County’s main settlements would reduce carbon in different ways by:

- reducing the need to travel, and travel by the private car in particular, by providing jobs, facilities and services locally and support active means of travel such as walking and cycling; and
- providing opportunities on a scale to design new neighbourhoods for renewable energy supply, alternatives to the private car and more energy efficient new buildings - opportunities that are likely to be more difficult to realise in rural areas.

2.1.11 The promotion of land to the south of RWB for residential led development would address the County’s aspirations for carbon reduction and achieve compliance with legislation and national planning policy expectations regarding climate change. Indeed, the development proposals would also improve Air Quality by reducing the number of HGV traffic travelling through the town centre, through



the provision of a southern bypass diverting traffic away from the town.



3 Proposed Development

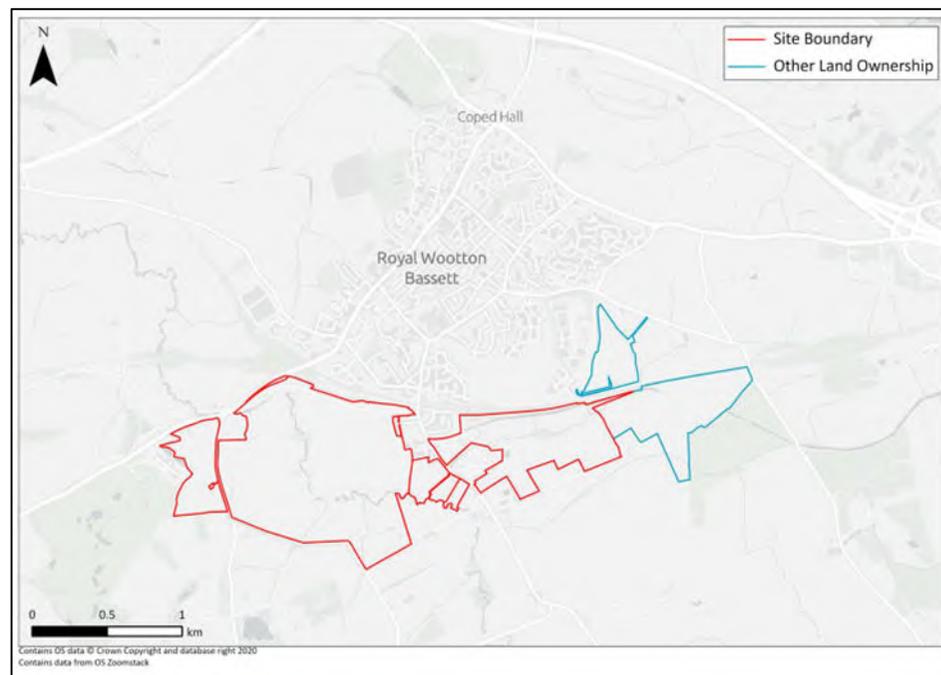
3.1 Development Vision

3.1.1 The location of the proposed development is illustrated of Figure 3-1. The development vision for South Royal Wootton Bassett includes the following elements:

- At least 2,000 homes.
- Approximately 6ha of employment.
- A 2.5FE Primary School.
- A Southern Bypass for Royal Wootton Bassett.
- Local Centre including:
 - shops
 - community uses; and
 - land for a healthcare facility.
- Parkland and green spaces.

3.1.2 The proposed mix of development on the site will complement and strengthen the existing town providing significant opportunities for trips to be internalised within the development and also contained within the town through the introduction of additional employment, education, health and retail facilities alongside the proposed residential development.

Figure 3-1: Proposed Development Location



3.1.3 In addition to the proposed land uses set out above, the development will also provide a new road linking the A3102 Hunts Mill Road to the west with Bicknoll Lane to the east and including a new crossing of the railway. As detailed in subsequent sections of this document, the provision of this road will offer significant benefits to RWB as a whole by removing significant traffic volumes and particularly HGV movements from the town centre.



4 Existing Travel in Royal Wootton Bassett

4.1 Local Highway Network

- 4.1.1 The site currently takes access from a 7.3 metre wide link road, which is now closed to general traffic. The link road was constructed as a temporary bypass whilst works were being undertaken on the railway bridge on Marlborough Road (planning application reference: 15/04898/CLP: *“Certificate of Lawfulness for Proposed Creation of New Accesses off A3102 (East), Marlborough Road (West) & Creation of Temporary Road Between & to the South of the Mainline Railway”*). When in use for general traffic, the link road formed the major arm with Marlborough Road north.
- 4.1.2 The section of the link road behind Dunnington Road and the access onto Marlborough Road has been reconfigured to provide access for Aggregate Industries.
- 4.1.3 Planning consent has also been granted for the remainder of the road (application reference 17/08559/FUL) for *“the permanent retention of existing temporary road as an agricultural access”*, with gated access from Hunts Mill Road to the west and the reconfigured Aggregate Industries access to the east. As part of this consent, it was agreed that the access onto the A3102 would be tightened up significantly from the wide junction which was constructed for the link road, using an appropriate fencing treatment.

- 4.1.4 Hunts Mill Road is a two-way single carriageway road, linking Lyneham and RWB. Between the link road and Wootton Bassett town centre there are two railway bridges. The south-western bridge is narrow with no footway and no centreline, whilst the north-eastern bridge is slightly wider with a 1.2 metre wide footway along the north-western edge. In the vicinity of the link road junction, Hunts Mill Road is subject to a 40mph speed limit.
- 4.1.5 Marlborough Road is a two-way single carriageway road. Marlborough Road has a continuous footway along the western edge to the north of the Templars Way Industrial Estate, and regular street lighting.
- 4.1.6 As illustrated in Figure 3-1, the land under the control of the promoters extends to the north of the railway, allowing connections to Bicknoll Lane and onwards towards Swindon and M4 J16.

4.2 Walking and Cycling

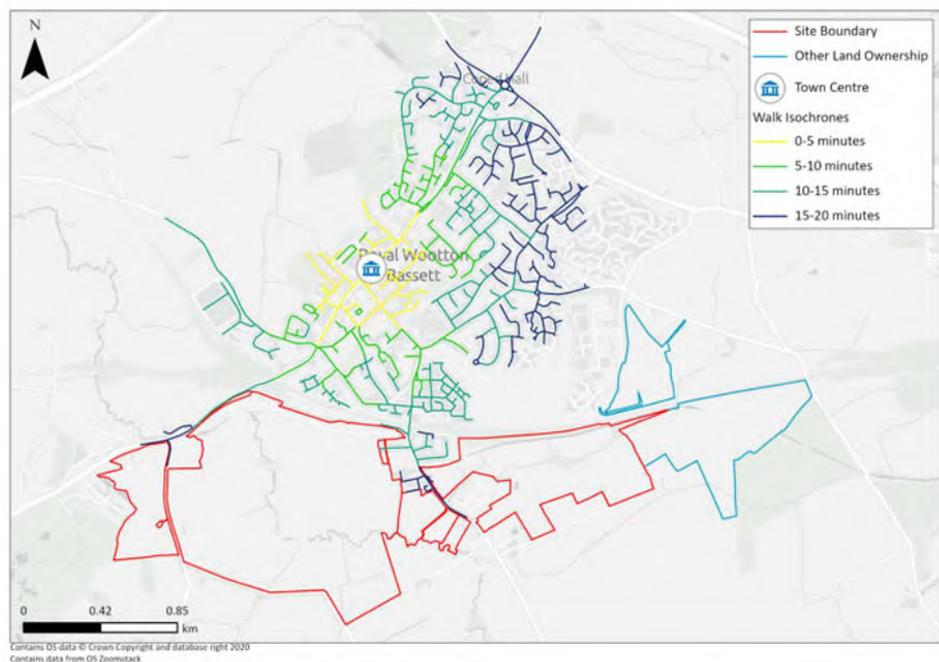
Walking Isochrones

- 4.2.1 Walking isochrones have been prepared, centred on RWB town centre, as shown in Figure 4-1.
- 4.2.2 These demonstrate that a development on land south of RWB would be well located for pedestrian access to the town centre, with a walk time of 15-20 minutes from the main pedestrian access points. This also demonstrates that the majority of the existing residents of RWB



are within a 20 minute walk of the town centre. There is therefore potential for almost all internal trips to be undertaken on foot.

Figure 4-1: Walk Isochrones



Propensity to Cycle Tool

4.2.3 DfT’s Propensity to Cycle Tool (PCT) was created to assist in the prioritisation of cycle investment and interventions, at both a strategic level and local level. The PCT is a powerful tool for understanding demand and potential for cycling in different areas, and to identify potential route alignments. It is worth noting that the PCT focuses on

commuting trips. While daily commuting is only a proportion of a person’s typical travel demand, it is nevertheless a regular and reliable activity which is therefore more predictable for forecasting.

4.2.4 The PCT provides two key outputs: Straight-Line analysis which identifies cycle flows between home address and place of employment, and the Route Network tool which applies the straight-line outputs to the local cycling network. The Straight-Line analysis is useful for understanding key desire lines between areas, whilst the Route Network outputs help to illustrate how the desire lines might affect the existing local network.

PCT Scenarios

4.2.5 The PCT tool uses a series of scenarios based on different levels of cycle flows. This chapter summarises the results for RWB based on these scenarios.

2011 Census

4.2.6 This baseline scenario uses journey to work data from the 2011 Census as the basis for the number and distribution of cyclist trips.



Government Target (Equality)

- 4.2.7 The government target is doubling levels of cycling nationwide. The PCT model adjusts this target locally, with the increase modelled to reflect local context including trip distance and hilliness. Therefore, areas with inherently higher potential for cycling would be able to achieve a much higher mode share than simply doubling existing users.

Government Target (Near Market)

- 4.2.8 This scenario also assumes a doubling of cycling nationally, accounting for trip distance and hilliness. However, this scenario additionally considers a number of sociodemographic and geographical characteristics, such as age, gender, ethnicity, car ownership and income deprivation to provide a more accurate 'near market' scenario.

Gender Equality

- 4.2.9 The gender equality scenario is based on the elimination of gender disparities and assumes that female propensity to cycle increases to match the male propensity to cycle.

Go Dutch

- 4.2.10 The Go Dutch scenario uses Dutch levels of cycle commuting (c. 22%) and applies this to currently English and Welsh commuting figures. This scenario is much more ambitious than the others however it is very

useful in understanding longer term demand for cycling flows and how this might affect local networks.

E-Bike

- 4.2.11 This scenario assumes widespread uptake of electric cycles (e-bikes) in addition to the 'Go Dutch' scenario and is therefore the most ambitious scenario. It assumes that all cyclists in the Go Dutch scenario own an e-bike, with additional scaling factors to account for increased willingness to cycle long distance and hilly routes.

PCT Outputs

- 4.2.12 The PCT route and straight line outputs are provided on the following pages.

Route Network Tool

- 4.2.13 Analysis of the 2011 Census scenario within the PCT shows that existing commuter demand is highest between RWB and Swindon, using the A3102 or routing through Hook and along Hook Street. It should be noted that this analysis is based on the existing route network and does not account for improvements in infrastructure such as a new cycle route between RWB and Swindon which would likely combine these demands into a single route.



Existing Travel in Royal Wootton Bassett

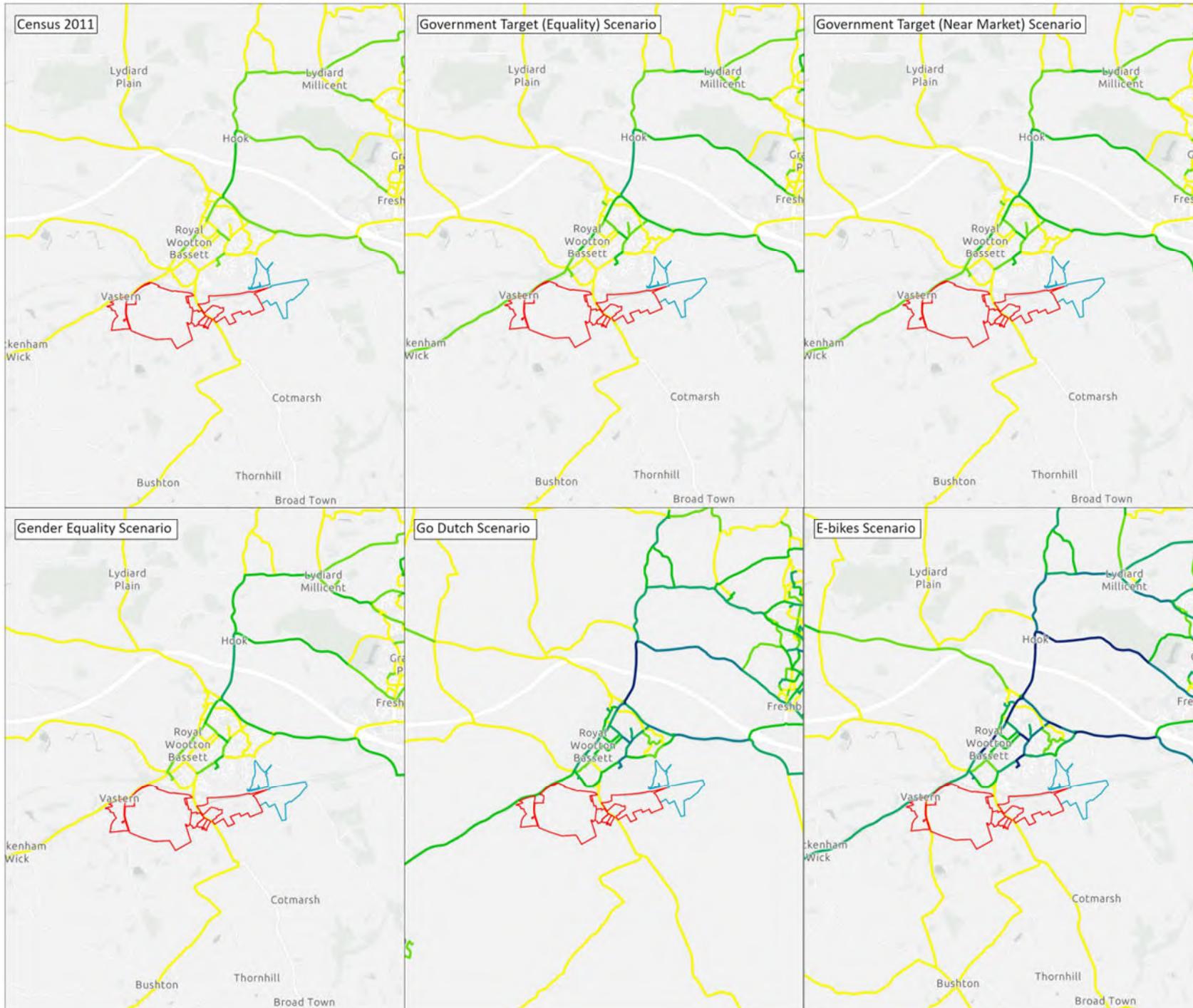
- 4.2.14 The future scenarios show potential for increased cycle use between these two towns, as well as internal to RWB. The future scenarios also show potential for increased cycle demand southwest along the A3102 towards Lyneham.
- 4.2.15 Within RWB, the assessment identifies Longleaze, Stoneover Lane and the A3102 High Street as key cycle corridors.

Straight Line Analysis

- 4.2.16 The straight line plan illustrates that cycle demand to/from RWB was low in the 2011 Census, with a small amount of demand internal to the town and between RWB and Swindon. This low baseline cycle use is likely to be a result of the majority of trips internal to Royal Wootton being walkable, with no cycle infrastructure provided on routes to other areas nearby.
- 4.2.17 To achieve the government target of doubling the levels of cycling nationwide, a considerable increase in these two existing cycle movements would be expected, with a small amount of cycle demand also expected to occur between RWB and Lyneham. In order for this to be realised, cycle infrastructure improvements would be needed, particularly between RWB and Swindon.
- 4.2.18 The e-bikes scenario is the most ambitious of the scenarios, showing 479 commuting cycle trips internal to RWB compared to 46 recorded in the 2011 Census. This scenario also shows potential for increased

cycle demand between RWB and Purton, Lyneham, Swindon, Wroughton and Brinkworth.

- 4.2.19 As set out in the following sections, the proposed development on Land South of RWB offers a significant opportunity to enhance pedestrian and cycle provision within the town to help achieve the potential shift in journeys to sustainable travel modes.



Esri UK, Esri, HERE, Garmin, METI/NASA, USGS



PJA

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CLIENT

SAVILLS

PROJECT

LAND SOUTH OF ROYAL
 WOOTTON BASSETT

TITLE

ROUTE TO TOWN CENTRE
 FROM WEST OF SITE

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:70,000	LS	CH	22/02/2021
FIGURE NUMBER		REVISION	
01		A	



Esri UK, Esri, HERE, Garmin, METI/NASA, USGS



The Aquarium
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 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT

SAVILLS

PROJECT

LAND SOUTH OF ROYAL
 WOOTTON BASSETT

TITLE

ROUTE TO TOWN CENTRE
 FROM WEST OF SITE

SCALE	DRAWN	REVIEWED	DATE
	LS	CH	22/02/2021
FIGURE NUMBER	REVISION		
01	A		



Access to RWB Town Centre

4.2.20 The distance from the site to RWB town centre means that the majority of journeys could be undertaken on foot, with some residents also expected to cycle. Each of the routes is summarised below. These are shown in **Appendix A**.

From the western site access onto the A3102

4.2.21 From the western site access, residents can walk along the A3102 directly to the town centre. There are no other alternative direct route options.

4.2.22 There is currently no footway provision between the existing link road and the southwestern railway bridge. A footway commences immediately after the southwestern railway bridge, continuing into RWB. The footway is typically 1.5-2 metres wide, although narrows across the eastern railway bridge to 1.2 metres due to the restricted width of the bridge. There are steps on this route on the High Street.

From the eastern site access onto Marlborough Road

4.2.23 There are a number of options for pedestrian trips from the eastern site access to the town centre:

- Route 1: Marlborough Road -> New Road -> A3102 High Street
- Route 2: Marlborough Road -> Station Road -> A3102 High Street

- Route 3: Marlborough Road -> New Road -> Morstone Road -> footpath through New Road Play Park -> Vale View -> Beamans Lane -> A3102 High Street
- Route 4: Marlborough Road -> New Road -> Vale View -> Beamans Lane -> A3102 High Street

4.2.24 There is a footway along the western edge of Marlborough Road in the vicinity of the site, with a width of approximately 1.5 metres. Where the footway crosses the railway bridge, pedestrian guardrailing is provided. There is additionally a shared cycle way and footway along the eastern edge of Station Road, commencing north of the mini-roundabout with Cloatley Crescent and New Road (where Marlborough Road becomes Station Road).

4.2.25 New Road has continuous footways along both sides. Along the eastern section, both footways vary in width between 1.5 and 2 metres. The western section of the road has a steep gradient, with the southern footway going up a very steep bank and reducing to approximately 1.0 metres in width and the northern footway remaining adjacent to the road with a width of between approximately 1.7 and 2 metres.

4.2.26 Within RWB town centre there are several Sheffield cycle stands grouped in pairs on the High Street. Pedestrians can make use of the



signalised crossings and footways along both sides of the High Street, separated from the carriageway by car parking.

4.3 Public Transport

Existing Public Transport Services

4.3.1 RWB benefits from frequent bus service between Wootton Bassett and Swindon which is provided as an integral part of a much longer inter-urban corridor also running west to Calne and Chippenham.

4.3.2 As set out in subsequent sections, discussions have been held with Stagecoach who operate the existing bus services within RWB. Stagecoach have confirmed ‘in principle’ support for the scheme and recognise the opportunities to minimise car dependence and develop a suitable public transport strategy that would benefit both existing and future residents of the town.

4.3.3 Table 4-1 outlines the buses available from the ‘*St Bartholemews*’ stop within RWB Town Centre.

Table 4-1: Summary of Existing Bus Services

Service Number	Route	Average Frequency	Operating Hours
31	Malmesbury - RWB - Swindon	Every 2 hours	06:40-17:56
	Swindon - RWB - Malmesbury	Every 2 hours	09:00-19:57
31A	Malmesbury - RWB - Swindon	Every 2 hours	07:28-18:55

Service Number	Route	Average Frequency	Operating Hours
	Swindon - RWB - Malmesbury	Every 2 hours	10:00-18:55
54	RWB - Swindon	Every 90 minutes	09:00-18:35
	Swindon - RWB	Every 90 minutes	09:55-17:55
55	Chippenham - RWB - Swindon	Every 30 minutes	04:25-00:15
	Swindon - Wootton Bassett - Chippenham	Every 30 minutes	05:16-00:22

4.3.4 The services within Table 4-1 all stop at the Swindon bus station, where numerous other buses can be accessed.

Existing Public Transport Catchment

4.3.5 Following a review of the existing sustainable accessibility network PJA have undertaken an assessment of the site with TRACC software to determine the distance that can be travelled within an hour of the site by bus travel. The catchment area for Bus Travel linked with walking and cycling is shown on **Figure 4.2**.

4.3.6 Utilising the public transport catchment areas shown in Figure 4.2, the proposed development is within a one-hour journey time of the following: in excess of 79,550 existing jobs, and primary retail centres in Swindon, Malmesbury, Calne and Chippenham. Bus Travel therefore offers the potential to be the primary mode for numerous journey purposes to and from the site.

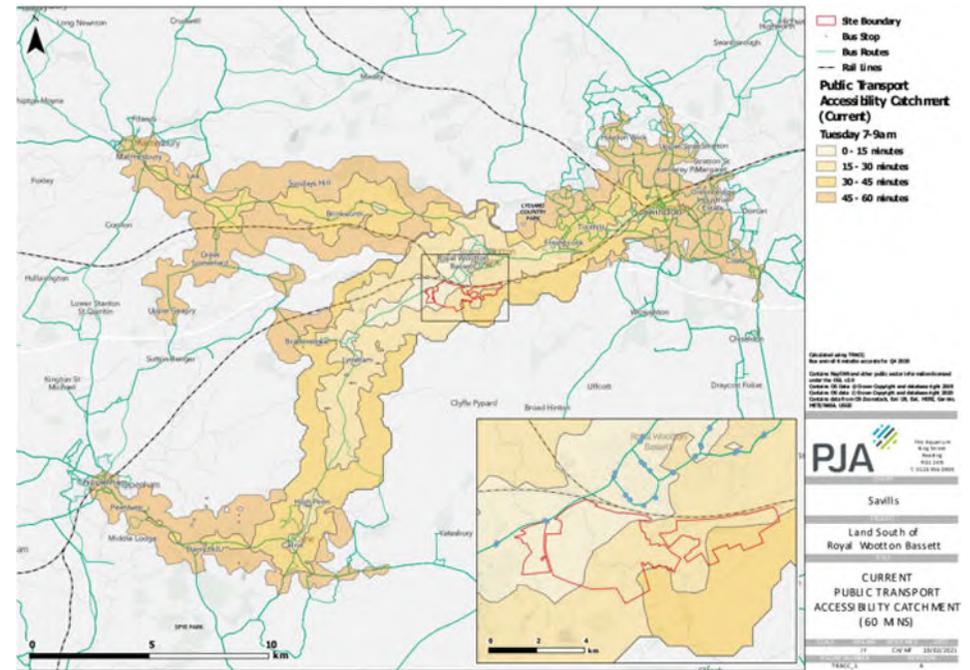
Cost Comparison

- 4.3.7 Within Swindon town centre, the cost of parking for a day (8 hours) ranges from £8 to £24, with a monthly Monday to Friday parking permit available for £135. Parking near Swindon railway station ranges from £8 to £10 for a day (8 hours), with a monthly permit available for £148.
- 4.3.8 By contrast, a Swindon Dayrider Plus bus ticket costs £4.80, with a four weekly ticket available for £63. This is therefore substantially cheaper than town centre car parking for single person trips, and similar to the cost of the cheapest car parking for two person trips.

Park & Ride

- 4.3.9 Swindon currently benefits from a Park and Ride site located to the southeast of the town, at the junction between Croft Road and the B4006. Accessing this from RWB would require a large detour for drivers.
- 4.3.10 However, a new Park and Ride facility is proposed within the Wichelstowe development (S/13/1524), which would be accessed from the B4005 via a new bridge across the M4. This would require minimal detour for people travelling into Swindon from RWB.

Figure 4-2: Bus Travel Accessibility Catchment Area



Rail Services

- 4.3.11 There is not currently a railway station within RWB however the development site offers the opportunity to safeguard land for the future delivery of a station. Swindon railway station is located approximately 11km from the site.



Existing Travel in Royal Wootton Bassett

4.3.12 The rail station is accessible by bus services 54 and 55 from the bus stops along the A3102, High Street, with an approximate 25 minute bus journey, every 30 minutes Monday to Saturday.

4.3.13 Swindon railway station provides the following peak hour services:

- Six trains per hour to London Paddington
- One train per hour to Cheltenham Spa
- One train per hour to Swansea
- Two trains per hour to Bristol Temple Meads
- One train per hour to Cardiff Central
- One train per hour to Westbury
- One train per day to Penzance



5 Royal Wootton Bassett Southern Bypass

5.1 Introduction

5.1.1 One of the key opportunities from the development is the potential to provide a southern bypass for RWB which will offer significant benefits to the town as a whole by removing significant traffic volumes and particularly HGV movements from the town centre. Further details of the scheme design and benefits are included below.

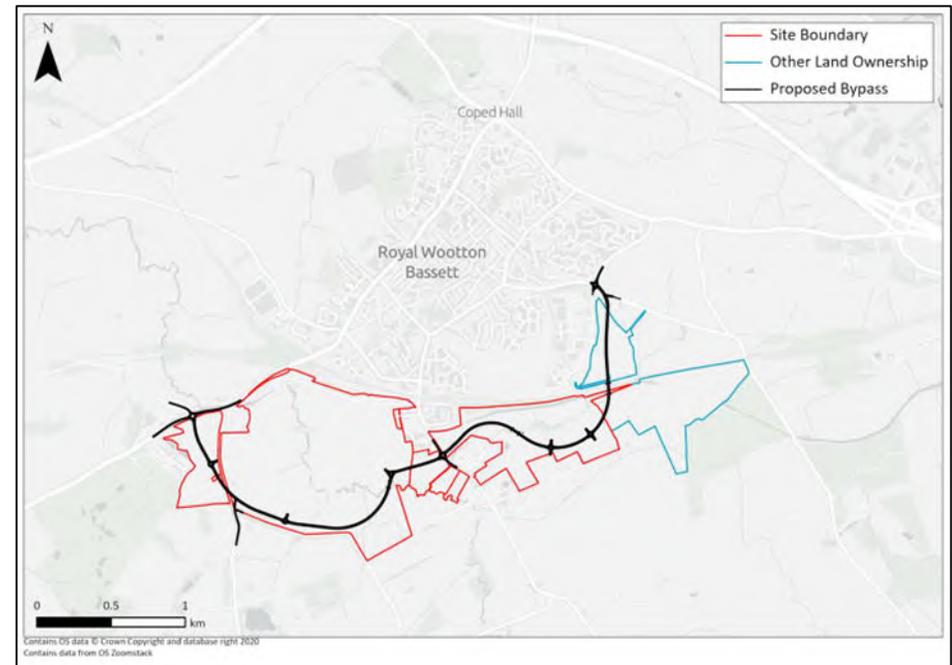
5.2 Southern Bypass Design

5.2.1 The preliminary design for the southern bypass was prepared based on the following principles:

- 40mph speed limit;
- 7.3 metre carriageway with active travel provision alongside;
- Designed to cross the flood plain at the most appropriate locations;
- A new 44 metre inscribed circle diameter (ICD) roundabout at the junction with the A3102, located at the existing private driveway which provides access to the equestrian centre;
- A new priority junction between the link road and Breach Lane, alongside the realignment of Breach Lane;
- A new 40 metre ICD roundabout at the junction with Marlborough Road, located at the edge of RWB;

- Adjustment to the eastern arm of the Bincknoll Lane / Evening Star junction, with the link road connecting directly to the roundabout and the existing minor road forming a priority junction with the link road;
- New bridges across the rivers and railway line, with the route designed to cross these at the most appropriate locations; and
- New roundabouts strategically placed along the route to provide access to the development parcels.

Figure 5-1: Southern Bypass Alignment





5.3 Benefits of Southern Bypass

5.3.1 GIS modelling has been undertaken based on data collected through ANPR surveys, which has demonstrated that a link road would reduce the journey time on a number of key routes resulting in a significant reassignment of trips away from the town centre. It is anticipated that through traffic in the town centre (i.e. vehicles that do not stop at a destination within the town) will reduce by 65% in the AM peak and 68% in the PM peak. Total traffic in the town centre will reduce by 21% in the AM peak and 23% in the PM peak and remove in excess of 4,600 vehicle trips per day from routing through the town.

5.3.2 The provision of the link road would also mean that 85% of trips associated with the proposed development would not impact on the existing road network within the town.

5.3.3 The key benefits associated with the provision of the link road would include:

- Reduced journey times for those currently routing through RWB.
- Reduced vehicle flows through RWB town centre, offering the opportunity for public realm improvements or the installation of traffic calming to further reduce speeds and decrease the attractiveness of this route for motor vehicles.
- Improved air quality within RWB town centre.

- Reduced potential for collisions in RWB town centre.
- Reduction in traffic noise in RWB town centre.
- Growth of the town through employment and housing development, which would help support local services and amenities.
- Improved access to / from the M4 via junction 16.
- The ability to facilitate development without exacerbating existing congestion issues within the town.

5.3.4 The full analysis of the benefits of the southern bypass are set out within the Assessment Note included as **Appendix B**.



6 Active Travel Strategy

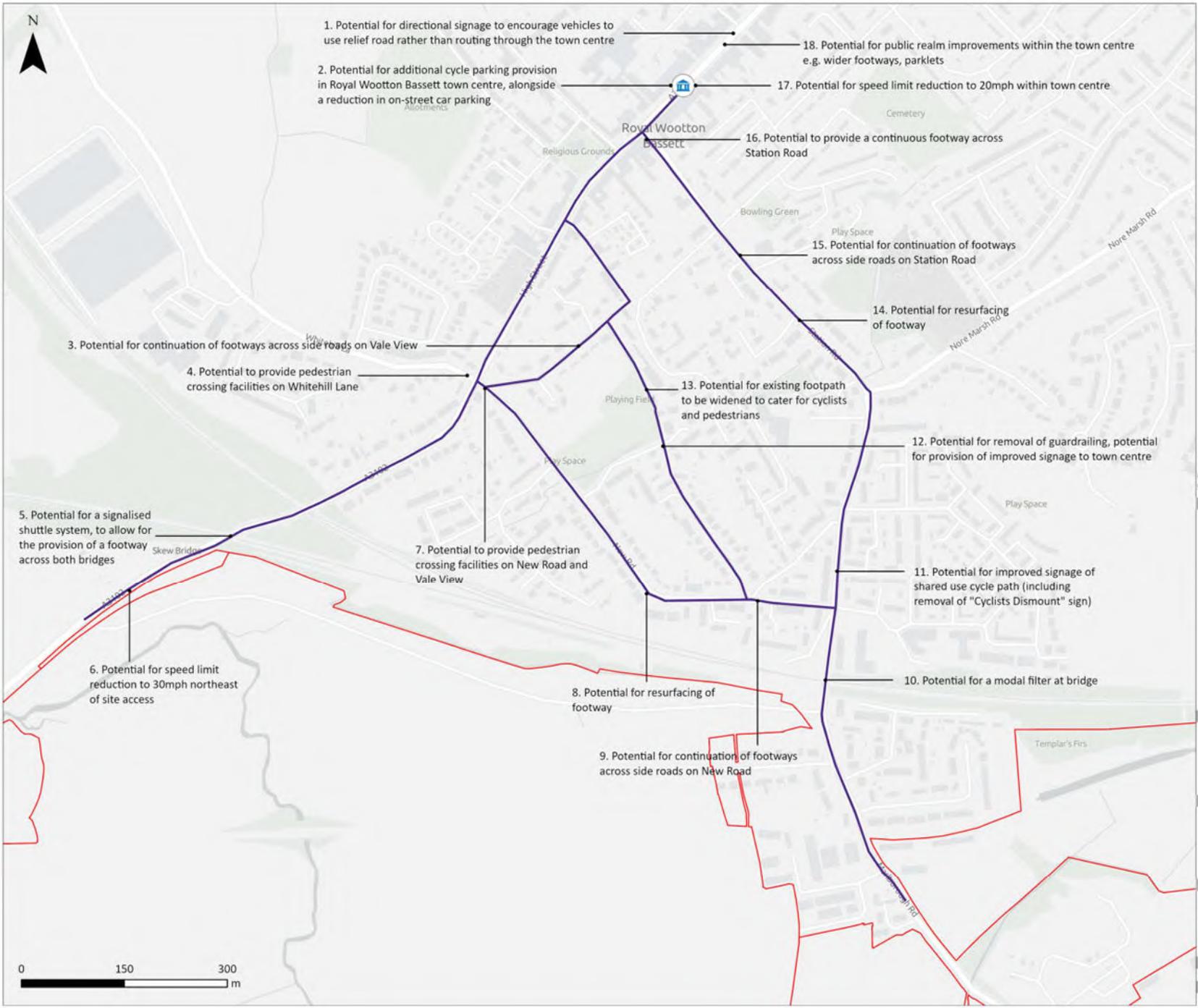
6.1 Introduction

- 6.1.1 High quality active travel opportunities are essential for any development.
- 6.1.2 The 2011 Census recorded that 12% of journey to work trips from RWB and the surrounding area (Middle Super Output Areas (MSOAs) Wiltshire 006 and Wiltshire 007) were undertaken on foot. These will predominantly be to destinations within the town. Cycling accounted for 3.9% of journeys to work from MSOAs Wiltshire 006 and Wiltshire 007 in the 2011 Census.
- 6.1.3 However as set out previously, there is significant potential for active travel in RWB to increase, with the majority of the residential areas within a 20 minute walk of the town centre. Active travel mode share could be increased further by facilitating cycle trips between RWB and the surrounding areas, particularly Swindon.
- 6.1.4 The Propensity to Cycle analysis has identified that cycle journeys between RWB and Swindon Borough could increase by 708% in the most ambitious e-bike scenario, potentially removing 843 vehicle trips from the highway network particularly through M4 J16.

- 6.1.5 To achieve a significant shift towards active travel for both existing and future residents will require investment in the walking and cycling infrastructure within RWB and also connecting the town to Swindon, however, as set out in the following sections the development is well placed to facilitate key elements of these improvements to the benefit of both existing and future residents.
- 6.1.6 A number of the improvements will also be facilitated by the reduction in traffic through the town centre following the introduction of the southern bypass, which will improve the pedestrian and cycle environment in this area and also allow space to be reallocated from vehicular travel to active modes.

6.2 Access to Town Centre

- 6.2.1 The routes into the town centre have been reviewed, and a number of potential locations for improvement have been identified, as shown in the figure on the following page. For each location potential best practice interventions have been identified that would encourage greater uptake of active travel modes within RWB. As part of any future Transport Assessment a full package of measures will be designed to ensure that walking and cycling trips are maximised.



- Site Boundary
- Possible routes to town centre
- Town Centre

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CLIENT
SAVILLS

PROJECT
**LAND SOUTH OF ROYAL
WOOTTON BASSETT**

TITLE
**ROUTES TO TOWN CENTRE
POTENTIAL IMPROVEMENTS**

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:5,000	LS	CH	23/02/2021
FIGURE NUMBER	REVISION		
07	A		

1. Potential for directional signage to encourage vehicles to use southern bypass rather than routing through town centre

Directional signage will be used to encourage drivers, particularly HGV drivers, to use the southern bypass for appropriate journeys. This will reduce traffic flows through RWB town centre, subsequently reducing car dominance within the town.

2. Potential for additional cycle parking provision in RWB town centre, alongside a reduction in on-street car parking

Cycle parking in RWB is limited to a small number of Sheffield stands on the High Street. These are insufficient to attract high volumes of cycle use, and therefore as part of the proposed development additional cycle parking could be provided.



There are currently 285 off-road car parking spaces in RWB, as well as on-street car parking on High Street and uncontrolled car parking on many of the local roads. Car parking on High Street is free for two hours, which will encourage car use for short trips to the town centre. Some existing car parking provision could be removed (whilst retaining accessible spaces and deliveries / servicing provision) to encourage residents to travel to the town centre by sustainable modes and provide additional space for pedestrian and cycle infrastructure. There is potential for some of the existing car parking spaces along High Street to be used to accommodate the additional cycle parking or parklets, as well as potential for widening of the footways and public realm improvements.

3, 9, 15, 16. Potential for continuation of footways across side roads

The continuation of footways / cycleways across side roads can be used to provide priority to pedestrians and / or cyclists when crossing. This is increasingly being used in urban areas, such as RWB, to minimise delay to pedestrians and cyclists.

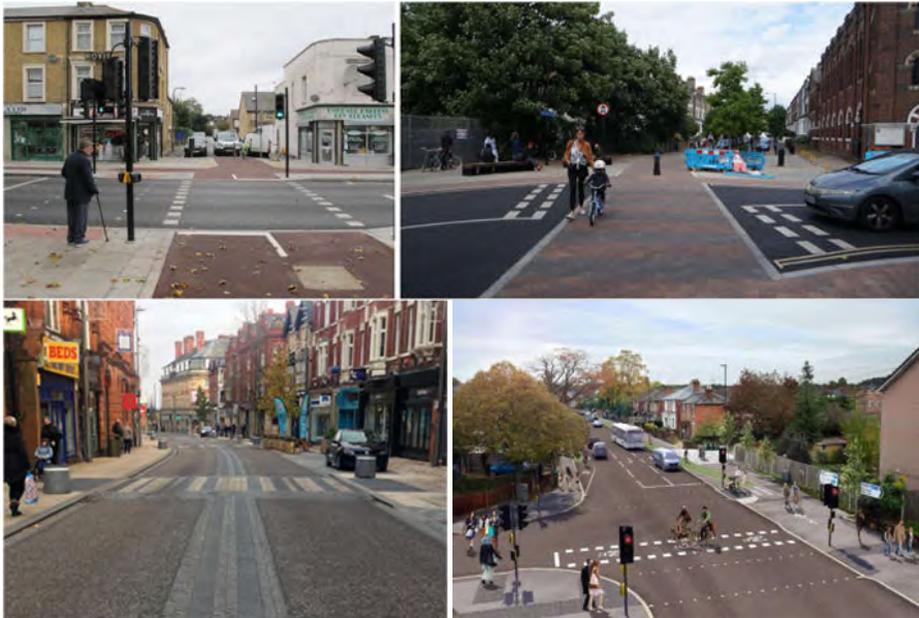




4, 7. Potential to provide pedestrian crossing facilities on Whitehill Lane, New Road and Vale View

There is currently no provision for pedestrians to cross Whitehill Lane, New Road and Vale View. Crossings could be provided, and the appropriate type of crossing will need to be determined based on traffic flow data, with consideration given to expected future changes in traffic demand.

There may also be potential for the junction radii to be reduced which would reduce the crossing distance, although this would need to be assessed based on swept path analysis.



5. Potential for a signalised shuttle system, to allow for the provision of a footway across both western bridges

There is currently no footway across the southwestern of the two western bridges. Furthermore, the width of this bridge does not allow for a HGV to pass a car, although there is no formal give way system in place to control this.

To improve the operation of this bridge, there is potential for a new signalised shuttle system to be implemented, allowing for one-way traffic flows only. This would facilitate the provision of a new footway link along the A3102 into the site.

6. Potential for speed limit reduction to 30mph at western site access

Currently, the speed limit changes from 40mph to 30mph to the east of the western bridges into RWB. Moving the speed limit change further west would improve the safety of pedestrians crossing the bridges, whilst also increasing the attractiveness of using the proposed southern bypass by inducing additional delay for town centre travel. A wider discussion with Wiltshire Council would be undertaken regarding the potential for increased use of 20mph speed limits within the town to further improve the pedestrian and cycle environment.

8, 14. Potential for resurfacing of footway on New Road and Station Road

Sections of the existing footway on New Road and Station Road are in relatively poor condition, and would benefit from resurfacing.

10. Potential for a modal filter at Marlborough Road Rail Bridge

A modal filter could be installed at the eastern bridge, to restrict access for private cars, whilst allowing buses, cycles and pedestrians through. At present, the bridge is not wide enough for a HGV to pass a car, although there is no formal give way system in place to control this. Not only would this provide a high-quality pedestrian and cycle connection on the main desire line between the site and the surrounding highway network but would also help to reinforce the benefits of providing the southern bypass by limiting through traffic in this location.

The impact of the modal filter would be tested as part of a future Transport Assessment for the site and would need to be controlled through signage and appropriate road surfacing, with potential for camera enforcement.





11. Potential for improved signage of existing shared use path
 During the site visit, it was observed that existing cycle provision in RWB is poorly signed. Prior to implementing further measures, it is important to ensure that existing provision is clear, particularly the shared cycle path on Station Road.

12. Potential for removal of guard railing at Richards Close, and improved signage to the town centre

The guard railing on the footpath approaches to Richards Close presents an obstruction to disabled users. Additionally, if this route were to be opened to cyclists, the guard railing would present a barrier to travel. This should therefore be removed.

13. Potential for existing footpath through playing fields to be widened to cater for cyclists and pedestrians

The existing path through the playing fields allows for pedestrian use only. For the majority of the length of this route there would be sufficient space to provide a high quality segregated cycle path. This would need to be appropriately signed and would provide a cycle link to RWB town centre from the southeast of the town and from the proposed development.



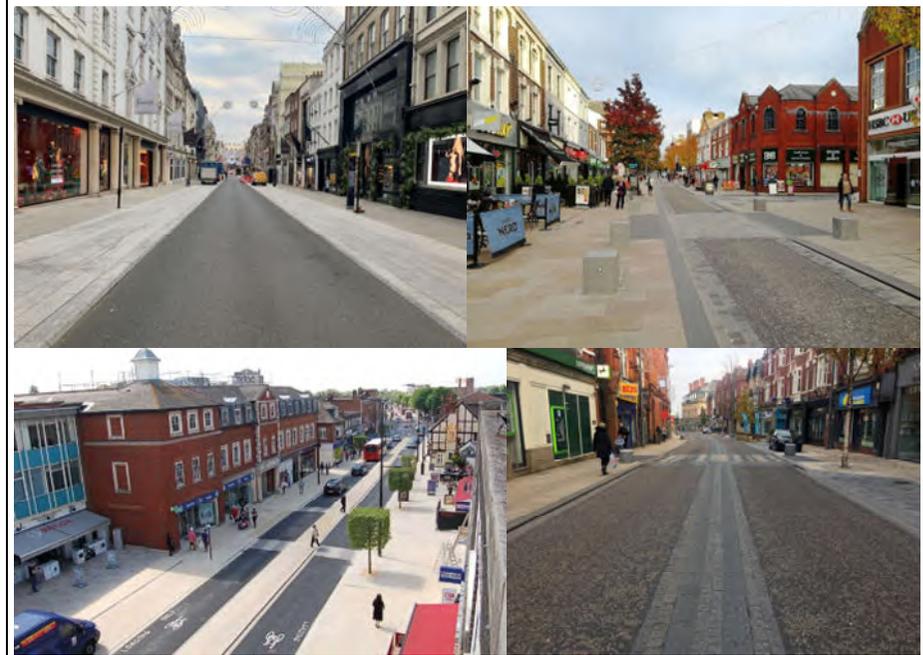
17. Potential for speed limit reduction to 20mph within town centre

A speed limit reduction in the town centre would improve safety for pedestrians and cyclists, as well as reducing the appeal of this route and making the bypass more attractive.

18. Potential for public realm improvements within the town centre and at key locations on routes linking to the development

Through a reduction in town centre traffic and on-street car parking, public realm improvements could be implemented in the town centre.

This could include for increased provision for pedestrians and cyclists, such as widened footways and increased levels of cycle parking. It could also allow for additional green space, such as parklets, to be incorporated, and for space to be provided for outdoor seating for cafes and restaurants.





6.3 Access to Schools

Primary Schools

- 6.3.1 A primary school is proposed within the development. The majority of primary school trips are therefore expected to remain internal to the site.

Secondary Schools

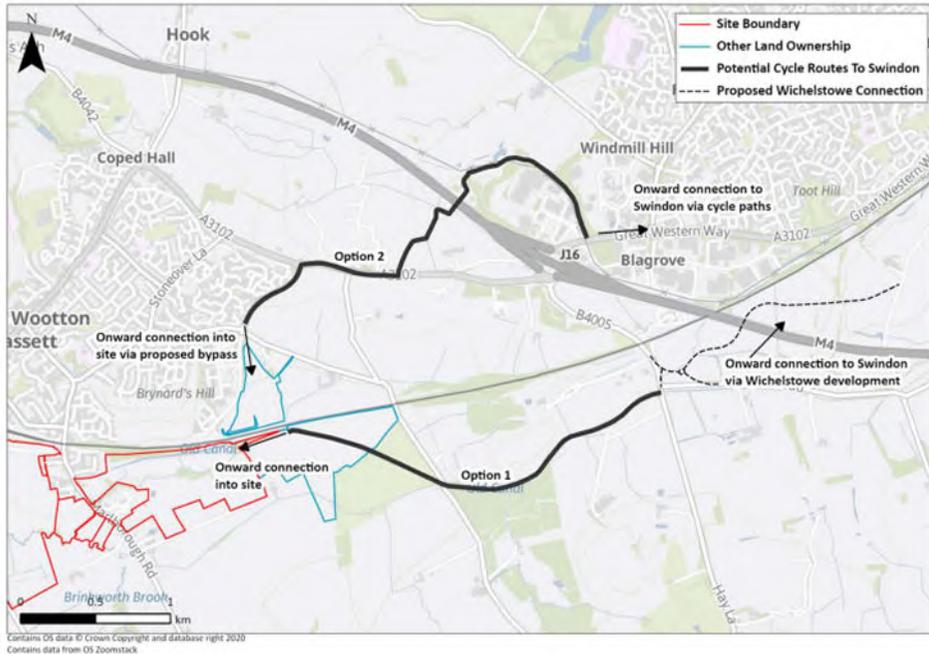
- 6.3.2 RWB Academy is located north of RWB town centre, approximately 1.8km from both proposed site accesses, which equates to a walk time of approximately 21 minutes.
- 6.3.3 It is most likely that pedestrians would use one of the routes listed above to reach the town centre, continuing north along the A3102 to Lime Kiln.
- 6.3.4 The section of the A3102 between the town centre and Lime Kiln benefits from footways and regular street lighting.
- 6.3.5 Lime Kiln also benefits from footways and street lighting between the A3102 and the school pedestrian entrance. In the vicinity of the school, Lime Kiln is subject to a 20mph speed limit with regular speed cushions. There are build outs, with narrow cycle bypasses. On-street car parking is unrestricted.

- 6.3.6 Additional active travel improvements along this route would be considered as part of a future Transport Assessment inline with the potential interventions set out above.

6.4 Access to Swindon

- 6.4.1 Trips from RWB to Swindon would be of a suitable distance to be undertaken by cycle. However, very few cycle journeys to work between the two towns were recorded using this mode in the 2011 Census compared to the potential for cyclists to make this journey demonstrated by the PCT. The limited existing cycle uptake is expected to be due to a lack of crossing facilities on the M4, with no cycle or pedestrian infrastructure provided on the Spittleborough Roundabout at junction 16 which is currently the most direct route.
- 6.4.2 Adopting the 'e-bike' assessment horizon within the PCT tool indicates that up to 962 commuting trips between the RWB and Swindon Borough could be undertaken by bike, the majority of which will currently be undertaken by car.
- 6.4.3 The development of land south of RWB would provide the opportunity for significant cycle improvements, benefitting both existing and new residents by providing a realistic active travel option for these journeys.

Figure 6-1: Potential Cycle Links to Swindon



Option One – Via Canal and Wichelstowe Development

6.4.4 The Wichelstowe development (application S/13/1524) to the south of Swindon proposes a new cycle and pedestrian route across the M4, to the southeast of the railway line. This is required to be implemented before the occupation of the 2500th dwelling within the Wichelstowe development, before any floor space within the Western employment area is occupied and before the Park and Ride is brought into use.

6.4.5 From land south of RWB, there is potential for a new cycle path to be installed along the route of the canal, subject to agreement with landowners along the route, to connect into the Wichelstowe provision.

6.4.6 Should this option be taken forward this would not only provide a largely traffic free route from the development to Swindon but would also support the wider objective of restoring the canal, by upgrading the towpath along the section to the east of RWB.

Option Two – Via A3102

6.4.7 In addition, there is a second option to connect RWB and Swindon for cyclists. Wiltshire Council, Sustrans and Highways England are currently working to implement a new cycle route between RWB and Swindon. A preferred route option has been selected following consultation and investigation work.

6.4.8 The proposed first section starts at the Interface Business Park in RWB, following local roads to the east of Sally Pussey's Inn on the A3102. This will comprise a new 3m wide path along the highway verge.

6.4.9 The proposed second section starts at the end of the first and provides a greenway, ending at the junction of the access road to the Lydiard Fields Business Park and the A3102 Great Western Way in Swindon. This will comprise a new 3m wide path over private land, subject to landowner agreement.



6.4.10 Wiltshire Council and Highways England are working together to implement these cycleways. The designs are due to be finalised in 2021 and land negotiations are in the final stages.

6.4.11 Wiltshire Council list a number of aims for the scheme on their website which would be fully supported by the proposed development. These are:

- *“Improve the quality, attractiveness and safety of cycle and pedestrian connectivity between RWB and Swindon*
- *Encourage modal shift from private car use to walking and cycling*
- *Help mitigate a forecast increase in traffic around Junction 16 of the M4 and RWB as a result of new development*
- *Reduce greenhouse gas and air pollutant emissions from traffic*
- *Contribute towards reducing journey times between Royal Wootton Bassett and Swindon by reducing reliance on private motor vehicles*
- *Improve transport choices between Royal Wootton Bassett and Swindon*
- *Reduce high levels of commuting by car.”*

6.4.12 Whilst this route would not directly serve the proposed development, the wider package of cycle improvements RWB that would be provided by the development would ensure prioritised and safe routes for cyclists between the scheme and the new link to Swindon.



7 Public Transport Strategy

7.1 Introduction

A package of bus priority measures are proposed, which are designed to minimise the predicted level of traffic congestion at M4 Junction 16, which is likely to result from increased housing and commercial development.

- 7.1.1 The safeguarding of land for the future delivery of a rail station has also been considered.

7.2 Options for Development Bus Services

- 7.2.1 Discussions have been held with Stagecoach who operate the existing bus services within RWB. Stagecoach have confirmed 'in principle' support for the scheme and recognise the opportunities to minimise car dependence and develop a suitable public transport strategy that would benefit both existing and future residents of the town.

- 7.2.2 A service of up to 15 minutes bus frequency serving the site operating to/from Swindon would be viable and the operator has confirmed that a development of the scale to that proposed to the south of RWB potentially would increase the viability of providing direct services between RWB and other destinations in Swindon other than the town

centre. This would enhance the potential for modal shift away from private vehicles for both existing and future residents of the town.

- 7.2.3 The potential for a bus gate at Marlborough Road is also being reviewed, as indicatively shown on Figure 7.1. This would close the road to traffic, except buses, cyclists and pedestrians. The purpose of this would be not only to prioritise bus services into and out of the site but also to improve the environment along Marlborough Road for pedestrians and cyclists and reinforce the role of the proposed southern bypass in removing traffic movements from the existing highway network.

7.3 Potential Bus Priority

- 7.3.1 The potential for bus priority along the A3102 on approach to the M4 Junction 16 is in discussion with Wiltshire Council and Stagecoach. This would reduce bus journey times along this section. An indicative plan of the improvements is illustrated in **Appendix C**.

- 7.3.2 The purpose of the proposed scheme would be to bypass the existing congestion on the A3102 approach to the junction and ensure that bus services are reliable and potentially offer journey time savings over private cars. The prioritisation of bus services will therefore encourage a shift from current patterns of travel, reducing the numbers of private cars travelling between RWB and Swindon, through M4 Junction 16.

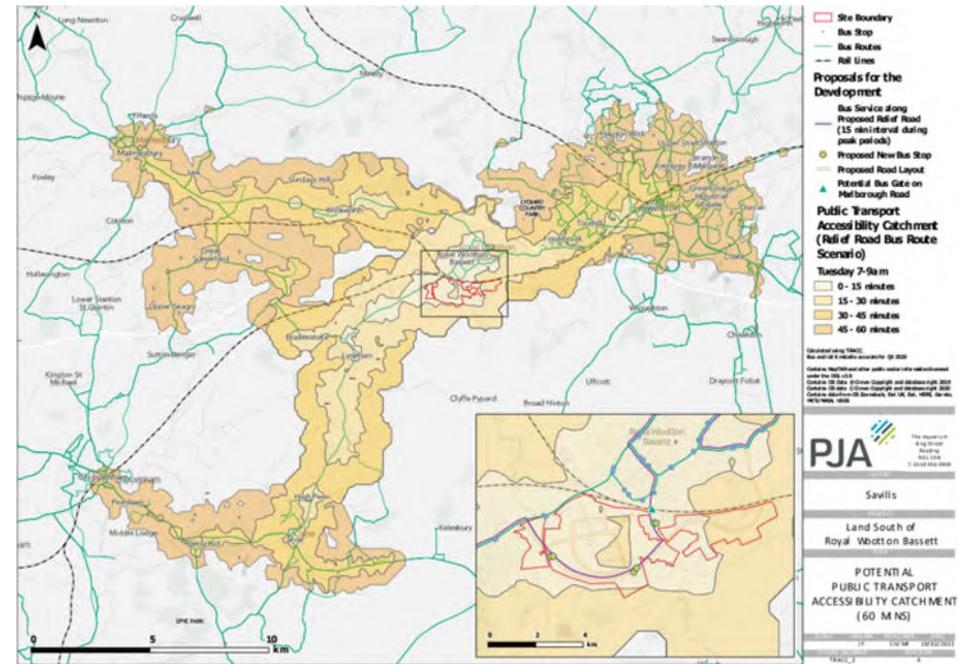


7.4 Public Transport Catchment

7.4.1 As detailed previously the site is located within a 60 minute public transport journey time of over 79,550 existing jobs within the key employment destinations of Swindon, Malmesbury, Calne and Chippenham. The site is well located within RWB to encourage journeys to be made by bus travel and benefits from existing services that can be diverted into the site along the proposed southern bypass, as indicatively shown on Figure 7.1.

7.4.2 With an assumed amendment to bus routings and a 15 minute bus frequency serving the site Figure 7.1 shows that the proposed development could be within a one-hour journey time of approximately 94,660 existing jobs (+19.0% compared to existing situation). It should be noted that this does not include for bus journey time enhancements from the proposed priority measures or the potential for additional destinations to be served within Swindon therefore the increase in accessibility from the site by Public Transport is likely to be significantly higher.

Figure 7-1: Potential Bus Connections and Potential Bus Accessibility Catchment



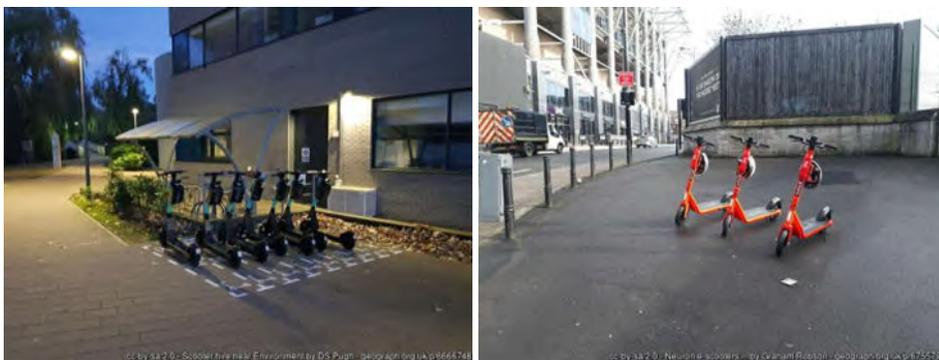
7.5 Safeguarding of Land for Future Rail Station

7.5.1 The Wiltshire Council’s Local Plan ‘Looking to the Future, Planning for RWB’, January 2021, document refers to priorities for RWB to include the safeguarding of land for a Swindon Parkway rail station, which this development site offers the opportunity to do although it should be noted that the delivery of the development is not reliant on a rail station coming forward within RWB.

8 On-Site Facilities

8.1 On-Site Walking and Cycling Infrastructure

- 8.1.1 Within the development, safe and comfortable places will be provided for people of all ages to walk, cycle, scoot and move around the site. This infrastructure will be designed based on the requirements set out in LTN 1/20 (or subsequent documents).
- 8.1.2 This will include the provision of segregated cycle and pedestrian infrastructure along the proposed southern bypass. On the local access roads, there is potential for modal filters to be included in the design, to make sustainable modes the most direct option and to remove through traffic from selected local roads.
- 8.1.3 Additionally, secure parking options will be provided within dwellings and at destinations within the site for cycles and scooters.



8.2 On-Site Local Amenities

- 8.2.1 As part of the Land South of RWB development, local amenities would be provided on site. This would maximise the potential for internal short distance walking and cycling trips. The proposed amenities include a primary school and a district centre comprising a supermarket, health facilities, community uses and shops. A Travel Hub would also be provided as part of the district centre, with the potential for this to include shared mobility services and support services, such as those listed below.
- 8.2.2 Additionally, approximately 6ha of employment space will be provided on site. This will provide jobs for new and existing residents.

8.3 Support Services

- 8.3.1 Support services would be provided across the site, such as:
 - Real time travel information, to be provided at key bus stops
 - Electric vehicle and e-bike charging
 - Multi-modal wayfinding
 - Pop-up cycle repairs / cycle shop



On-Site Facilities

8.3.2 There is also potential for intelligent transport services to be implemented as part of the development. For example, this may include wireless vehicle charging, smart parking solutions, and infrastructure to support automated and connected vehicles.

8.4 Public Transport

8.4.1 Following discussions with Stagecoach, it has been identified that a bus service with a frequency of every 15 minutes could be provided between the development and Swindon. Within the site, this would route along the proposed southern bypass. Regular stops would be provided, with high quality waiting facilities and real time information.

8.5 Mobility as a Service

8.5.1 In addition to the walking, cycling and public transport initiatives set out above, another key element of the sustainable travel strategy will be the development of the concept of mobility as a service. This will be achieved with a combination of measures delivered by the site and also support for wider measures that can be delivered in RWB and surrounding areas to facilitate future growth.

8.5.2 The key elements that could be incorporated include:

- Shared mobility, which includes travel options where people ride with other travellers, as well as where one individual uses a shared vehicle;

- Provision of on-demand e-bike, cargo bike and e-scooter hire to reduce the need to undertake journeys by car;
- Provision of car club vehicles across the site and incentivised membership to reduce the need for private car ownership;
- Personalised travel planning provided to inform all future residents of the opportunities and benefits of sustainable travel;
- Integrated journey planning app offering real time multi modal comparisons between different options and suggesting preferred mode based on users requirements (quickest / cheapest / most environmentally friendly etc);
- Single ticketing with simplified payment across all transport options to encourage multi modal longer distance journeys as an alternative to the car.





9 Impact on M4 Junction 16

- 9.1.1 Junction 16 of the M4 is of vital importance to RWB, providing a link to the M4 and to Swindon.
- 9.1.2 Improvements to the M4 junction 16 were completed in 2018, including additional lanes, widening of motorway slip roads, drainage improvements, new traffic signals and street lights, and a new dedicated right turn from RWB towards Wroughton. This upgrade was needed to support the planning consent for the housing development at Wichelstowe (S/13/1524, S/02/2000), with completion required prior to the occupation of the 1,100th dwelling.
- 9.1.3 Given the scale of works undertaken previously, significant further upgrades to capacity in this location are unlikely to be feasible without major changes to the junctions.
- 9.1.4 As set out previously there is strong potential for growth in cycling between RWB and Swindon that will be facilitated by new dedicated routes connecting the two settlements. Adopting the 'e-bike' assessment horizon within the PCT tool indicates that up to 962 commuting trips between the two settlements (RWB and Swindon Borough) could be undertaken by bike, the majority of which will currently be undertaken by car passing through M4 J16.

- 9.1.5 In addition to an increase in cycle trips, there is also strong potential for growth in bus travel between RWB and Swindon. The provision of bus priority on the approach to M4 J16 will significantly improve bus journey times relative to car journeys on the route encouraging both existing drivers and new residents out of their cars. As indicated by Stagecoach, the scale of the development will make it feasible to be directly served by high frequency bus services and also open up opportunities to provide links to a wider range of destinations within Swindon, further encouraging modal shift away from private cars.
- 9.1.6 Whilst invariably some traffic will route from the proposed development to M4 Junction 16, further capacity upgrades are unlikely to be necessary to support the proposed development of land to the south of RWB, given the comprehensive provision of sustainable transport improvements proposed which seek to minimise private car use through the junction and achieve a modal shift for existing residents, creating headroom at the junction for additional traffic.



10 Summary and Conclusions

10.1 Summary

10.1.1 PJA has been commissioned by Savills to provide transport advice in relation to the promotion of land to the south of RWB for a residential led development within the emerging Wiltshire Local Plan Review.

10.1.2 The development vision for South Royal Wootton Bassett includes the following elements:

- At least 2,000 homes.
- Approximately 6ha of employment.
- A 2.5FE Primary School.
- A Southern Bypass for Royal Wootton Bassett.
- Local Centre including:
 - shops
 - community uses; and
 - land for a healthcare facility.
- Parkland and green spaces.

10.1.3 The proposed mix of development on the site will complement and strengthen the existing town providing significant opportunities for trips to be internalised within the development and also contained within the town.

10.2 Conclusions

10.2.1 The key conclusions from this transport strategy review are as follows:

- The development proposals would be in accordance with Wiltshire Council's Local Plan Review document's aims and aspirations for sustainable development, carbon reduction and compliance with policies relating to climate change.
- The proposed development on land south of RWB offers a significant opportunity to enhance pedestrian and cycle provision within the town to help achieve the potential shift in journeys to sustainable travel modes.
- The development will provide a new road linking the A3102 Hunts Mill Road to the west with Bicknoll Lane to the east and including a new crossing of the railway. The provision of this road will offer significant benefits to RWB as a whole by removing significant traffic volumes and particularly HGV movements from the town centre facilitating active travel improvements and betterments in Air Quality;
- The provision of the link road would also mean that up to 85% of trips associated with the proposed development would not impact on the existing road network within the town.
- The Propensity to Cycle analysis has identified that cycle journeys between RWB and Swindon Borough could increase by 708% in the



most ambitious e-bike scenario, potentially removing 843 vehicle trips from the highway network particularly through M4 J16.

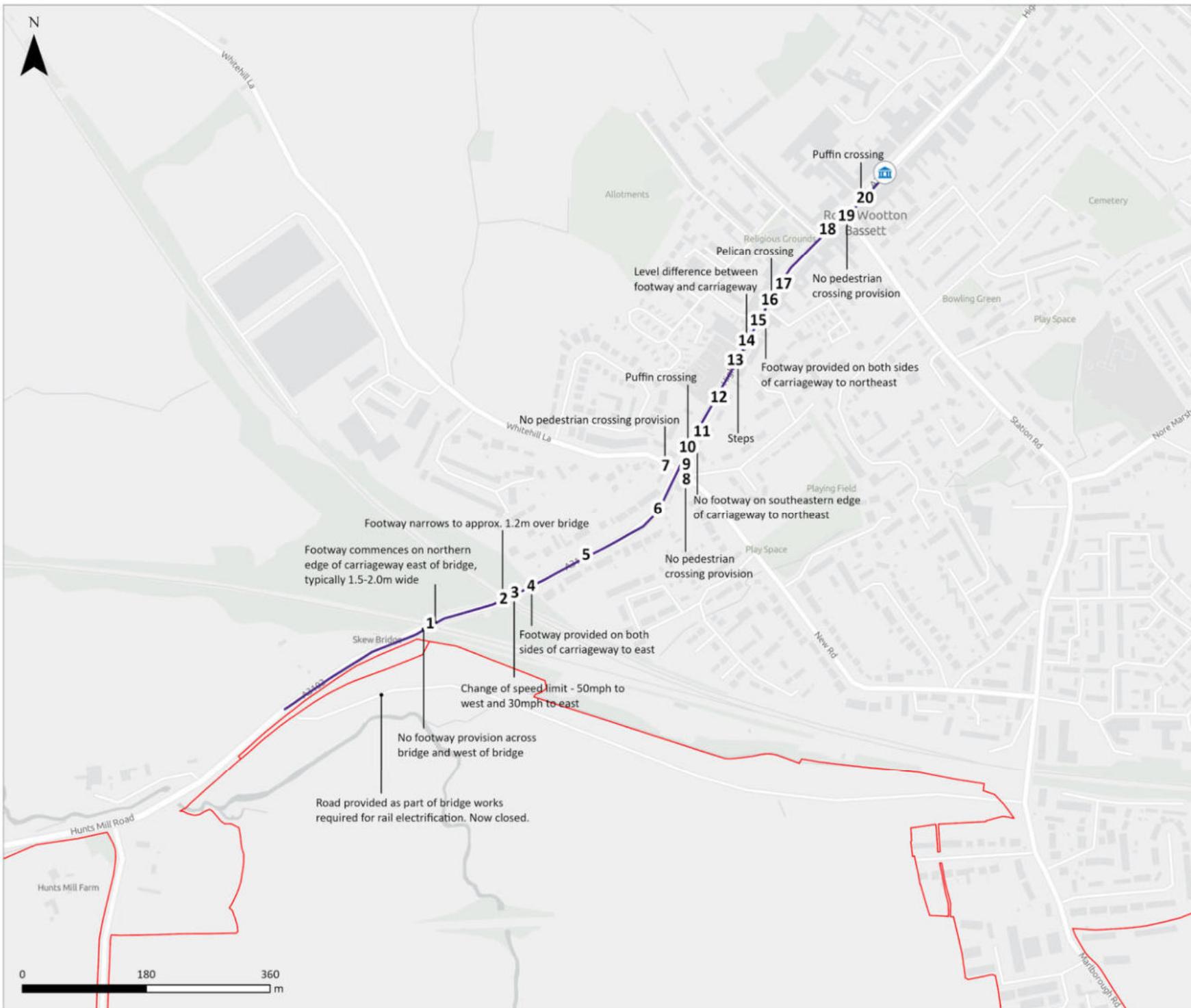
- From land south of RWB, there is potential for a new cycle path to be installed along the route of the canal, subject to agreement with landowners along the route, to connect into the Wichelstowe cycle provision.
- Stagecoach have confirmed 'in principle' support for the scheme and recognises the opportunities to minimise car dependence and develop a suitable public transport strategy that would benefit both existing and future residents of the town.
- A package of bus priority measures are proposed, which are designed to minimise the predicted level of traffic congestion at M4 Junction 16. These include the option of a viable bus service with a frequency of every 15 minutes provided between the development and Swindon; the potential for a bus gate at Marlborough Road and the potential for bus priority along the A3102 on approach to the M4 Junction 16.
- The development site offers the opportunity to safeguard land for the future delivery of a rail station.
- Within the development, safe and comfortable places will be provided for people of all ages to walk, cycle, scoot and move around the site. This infrastructure will be designed based on the requirements set out in LTN 1/20 (or subsequent documents).

- Provision of on-demand e-bike, cargo bike and e-scooter hire to reduce the need to undertake journeys by car could be incorporated into the development proposals.
- Provision of car club vehicles across the site and incentivised membership to reduce the need for private car ownership could also be incorporated into the development proposals.
- Whilst invariably some traffic will route from the proposed development to M4 Junction 16, further capacity upgrades are unlikely to be necessary to support the proposed development of land to the south of RWB, given the comprehensive provision of sustainable transport improvements proposed which seek to minimise private car use through the junction and achieve a modal shift for existing residents, creating headroom at the junction for additional traffic.

10.2.2 Based on the conclusions of this transport strategy appraisal, the site would represent a suitable location for future residential led development from a transport perspective, with the potential to offer significant benefits to the wider town and should be promoted as part of the emerging Wiltshire Local Plan Review.



Appendix A Routes to RWB Town Centre



- Site Boundary
- Town Centre
- Route to Town Centre from Western Access

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LAND SOUTH OF ROYAL
 WOOTTON BASSETT

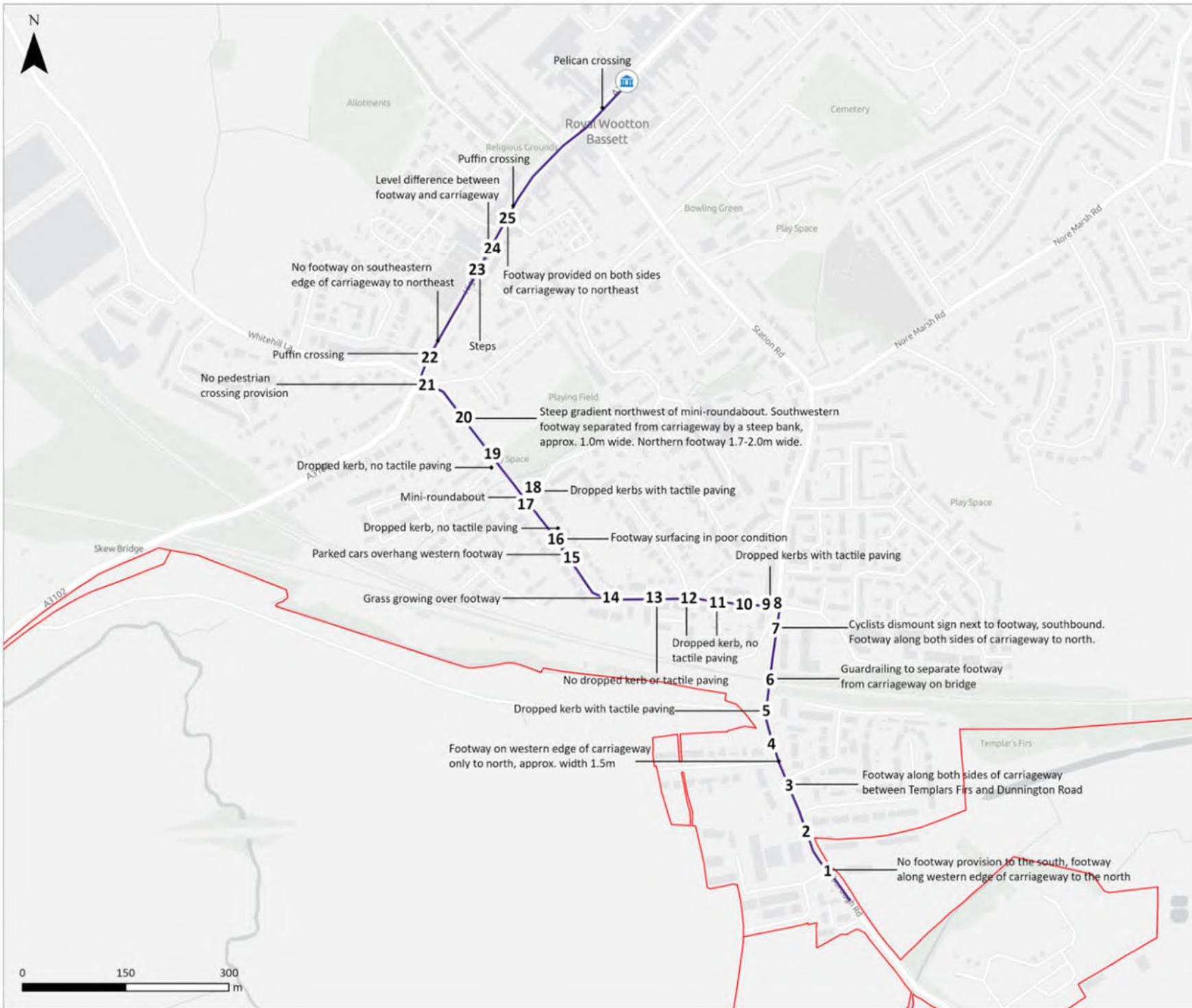
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ROUTE TO TOWN CENTRE
 FROM WEST OF SITE

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:5,000	LS	CH	22/02/2021
FIGURE NUMBER	REVISION		
01	A		

Route to Town Centre from West





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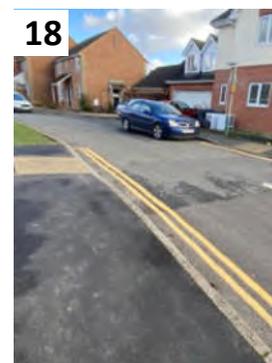
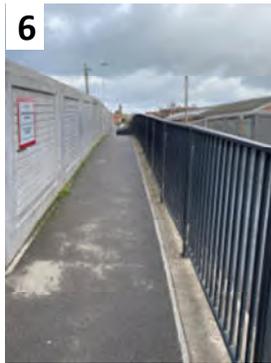
LAND SOUTH OF ROYAL
WOOTTON BASSETT

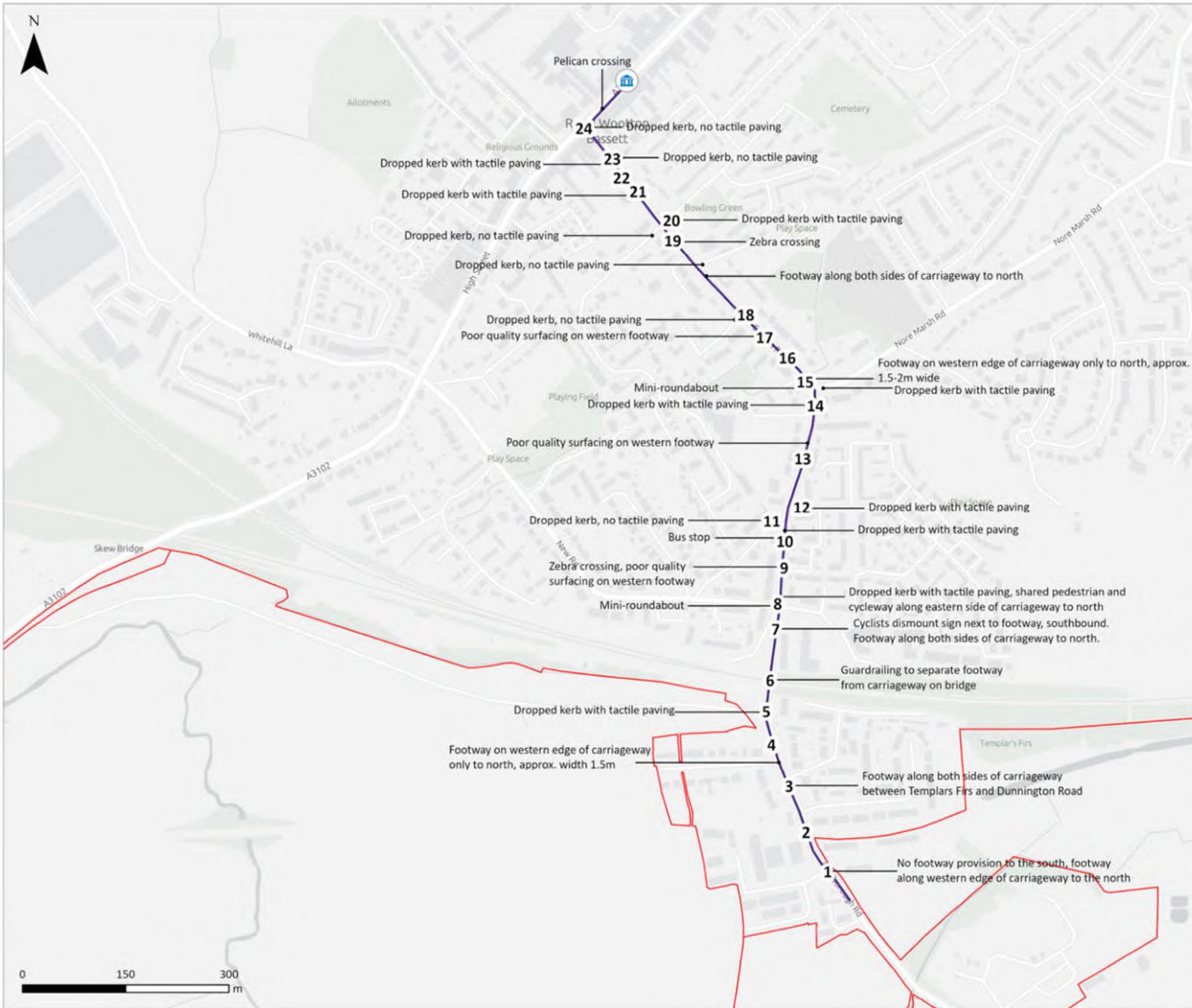
TITLE

ROUTE 1 TO TOWN CENTRE
FROM EAST OF SITE

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:5,000	LS	CH	22/02/2021
FIGURE NUMBER	REVISION		
02	A		

Route to Town Centre from East 1 – Via Marlborough Road, New Road and A3102





- Site Boundary
- Town Centre
- Route to Town Centre from Eastern Access 2

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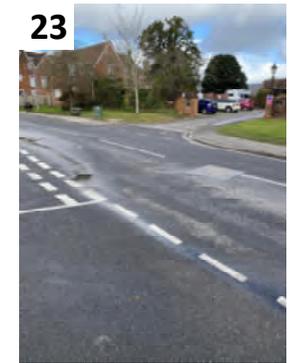
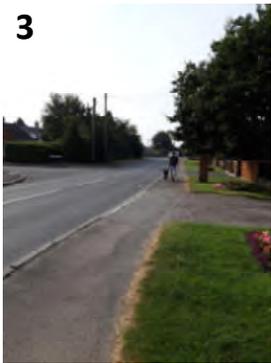
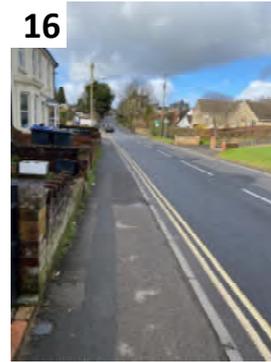
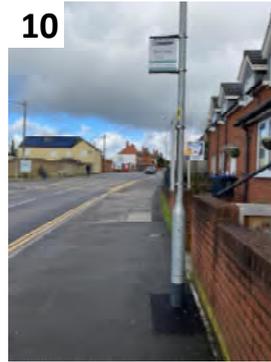
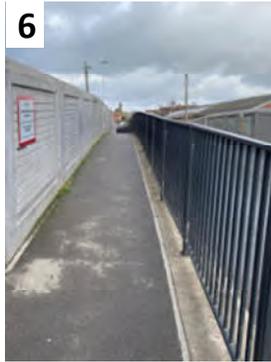
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LAND SOUTH OF ROYAL WOOTTON BASSETT

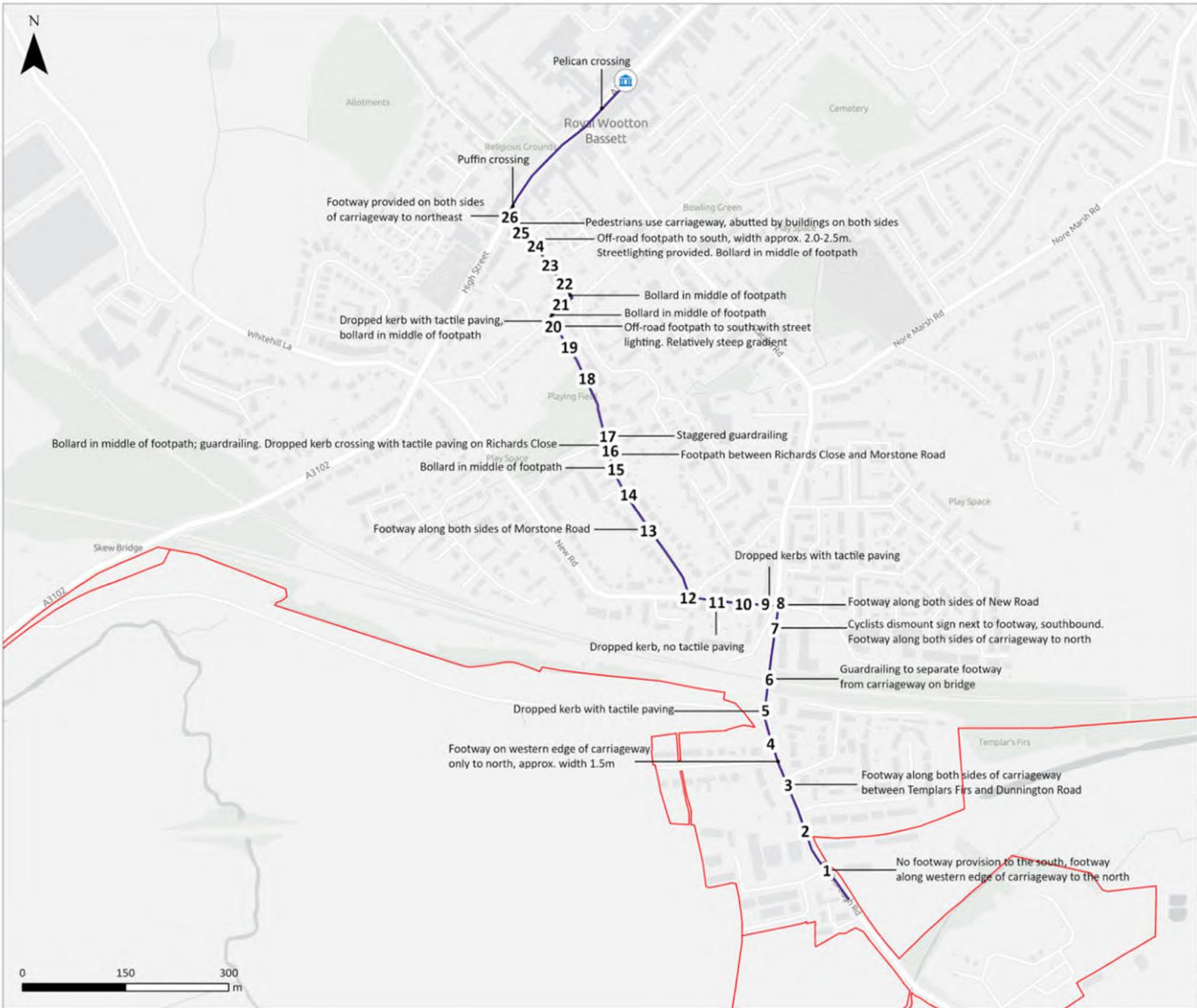
TITLE
ROUTE 2 TO TOWN CENTRE FROM EAST OF SITE

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:5,000	LS	CH	22/02/2021
FIGURE NUMBER	REVISION		
03	A		



Route to Town Centre from East 2 – Via Marlborough Road, Station Road and A3102





- Site Boundary
- Town Centre
- Route to Town Centre from Eastern Access 3

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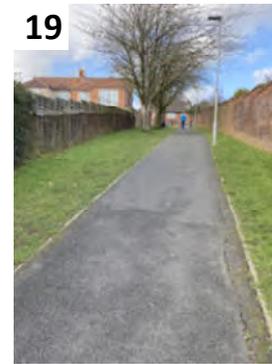
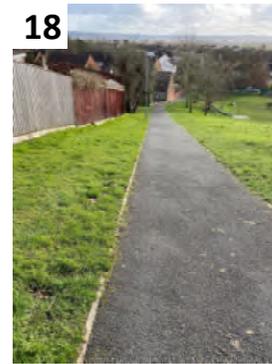
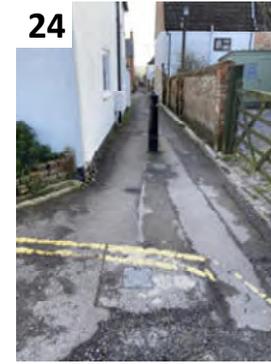
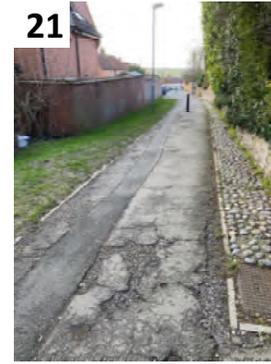
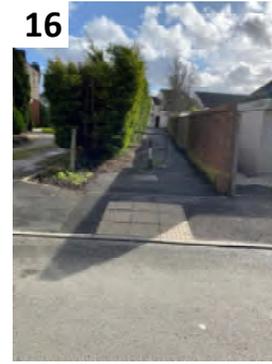
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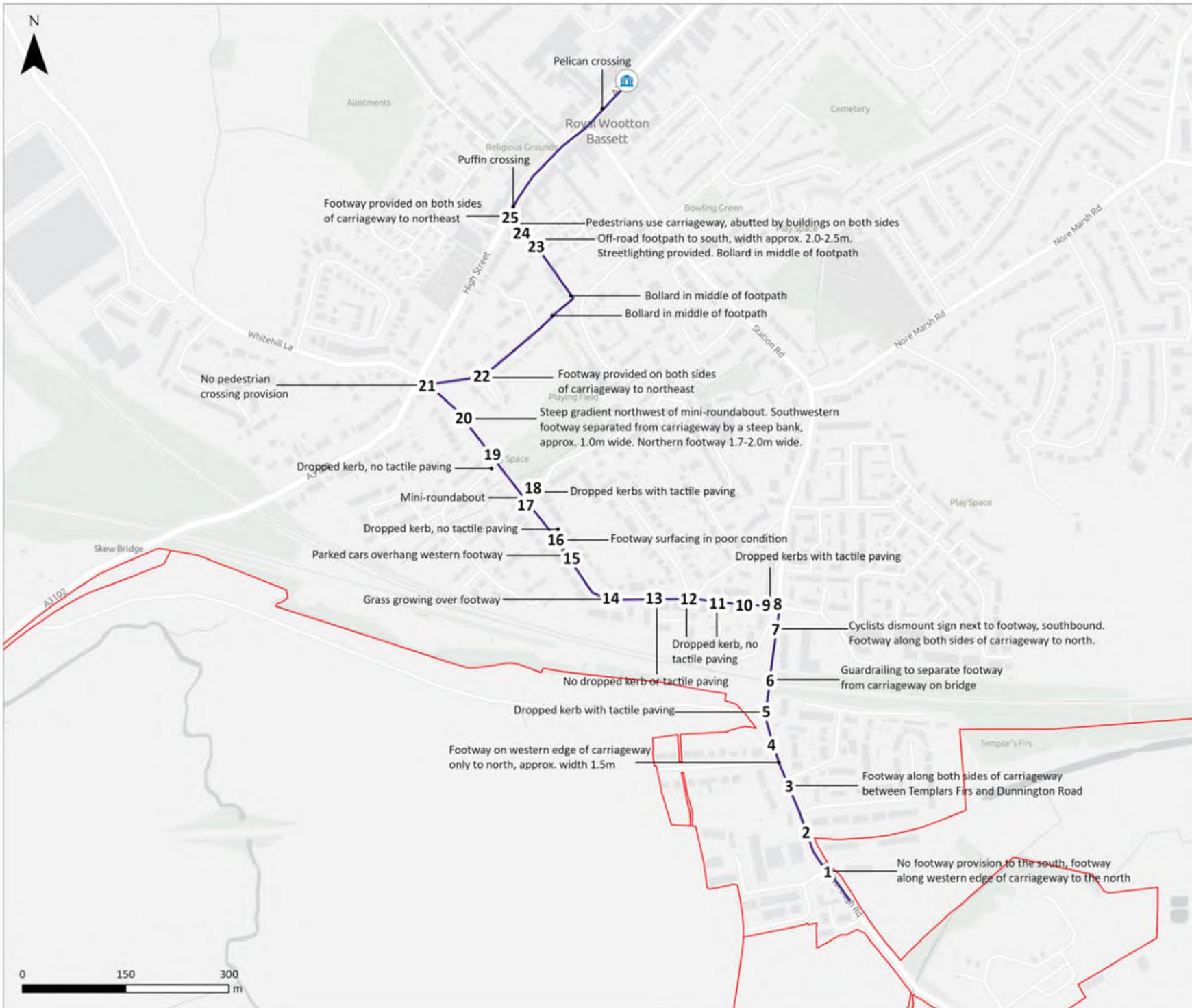
PROJECT
**LAND SOUTH OF ROYAL
 WOOTTON BASSETT**

TITLE
**ROUTE 3 TO TOWN CENTRE
 FROM EAST OF SITE**

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:5,000	LS	CH	22/02/2021
FIGURE NUMBER	REVISION		
04	A		

Route to Town Centre from East 3 – Via Marlborough Road, New Road, Morstone Road, footpath, Vale View, Beamans Lane, A3102





- Site Boundary
- Town Centre
- Route to Town Centre from Eastern Access 4

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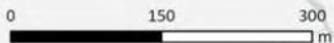
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LAND SOUTH OF ROYAL
WOOTTON BASSETT

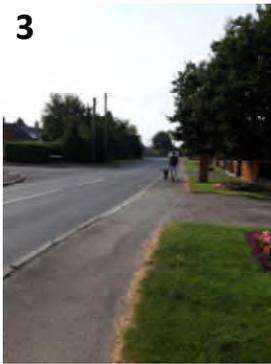
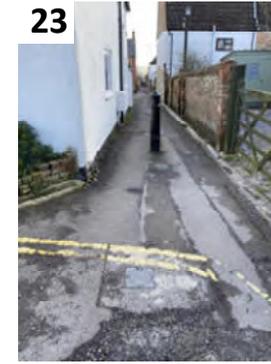
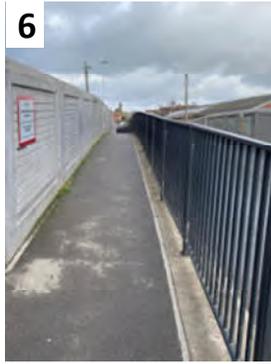
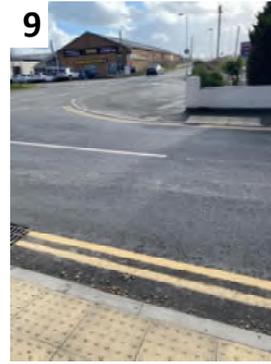
TITLE

ROUTE 4 TO TOWN CENTRE
FROM EAST OF SITE

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:5,000	LS	CH	22/02/2021
FIGURE NUMBER		REVISION	
05		A	



Route to Town Centre from East 4 – Via Marlborough Road, New Road, Vale View, Beamans Lane, A3102





Appendix B Southern Bypass Assessment Note

Technical Note

Project: Land South of Royal Wootton Bassett

Subject: Royal Wootton Bassett - Southern Link Road Traffic Assessment

Client:	Savills	Version:	A
Project No:	04028	Author:	LS
Date:	14/11/2019	Approved:	MF

I Introduction and Executive Summary

1.1.1 PJA has been commissioned by Savills to provide transport advice in relation to the promotion of land to the south of Royal Wootton Bassett for a residential led development within the emerging Wiltshire Local Plan Review. As part of a comprehensive development across the site it is proposed that a new southern link road is constructed which will serve the development and also provide significant benefits to the wider town.

1.1.2 The purpose of this note is to set out details of the existing traffic distribution through Royal Wootton Bassett and to demonstrate how this would likely change following the introduction of the proposed southern link road.

1.1.3 The key findings of this note are as follows:

- A preliminary design for a link road to the south of Royal Wootton Bassett has been prepared, with a length of approximately 4.5km and a 40mph design speed.
- 439 existing trips are likely be diverted to the link road in the AM peak, and 512 existing trips that currently route through the town would be diverted to the link road in the PM peak. Overall it is anticipated that in excess of 4,600 daily vehicle movements through the town would reassign onto the proposed link road.
- Currently 676 vehicle trips in the AM peak and 751 vehicle trips in the PM peak pass through the town centre without stopping at any other destinations. The delivery of the link road would reduce these trips by 65% in the AM peak and 68% in the PM peak.
- This equates to a reduction in total traffic within the town centre of 21% in the AM peak and 23% in the PM peak resulting in significant benefits for the town;
- The delivery of the link road will mean that 85% of trips associated with both the employment and residential development would not travel through the town centre and would instead

use the proposed link road or Hunts Mill Road / Marlborough Road for destinations to the south of the town.

- 1.1.4 The above demonstrates that the proposed link road would have a significant impact on Royal Wootton Bassett town centre, reducing the traffic flows and thus reducing congestion and improving the environment for other road users including pedestrians and cyclists.

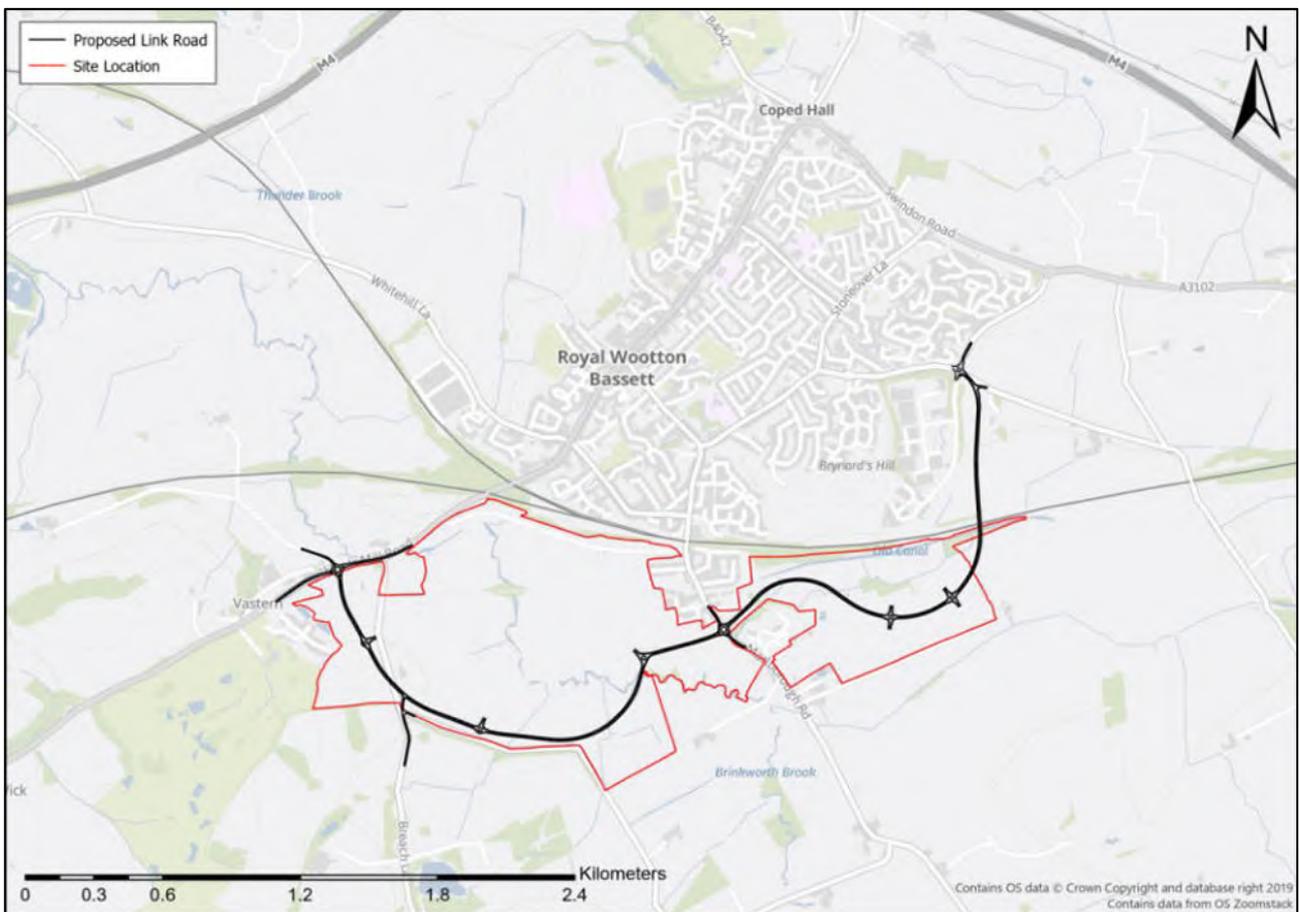
2 Proposed Development and Link Road

2.1 Development Proposals

2.1.1 The land which is subject to promotion is undeveloped with the exception of a road across the northern boundary of the site which was constructed as a temporary bypass whilst works were being undertaken on the railway bridge on Marlborough Road (planning application reference: 15/04898/CLP: “Certificate of Lawfulness for Proposed Creation of New Accesses off A3102 (East), Marlborough Road (West) & Creation of Temporary Road Between & to the South of the Mainline Railway”).

2.1.2 It is anticipated that any development of the site will come forward in stages. The first stage will comprise an initial employment development and some residential development, utilising the existing relief road from the A3102 for access. Subsequently, additional residential and employment development would be facilitated through the provision of a new southern link road, shown in Figure 2-1.

Figure 2-1: Proposed Development Location



2.1.3 The preliminary design for the link road was prepared based on the following principles:

- 40mph speed limit;
- 7.3 metre carriageway width with 2.0 metre wide footways on both sides;
- Designed to cross the flood plain at the most appropriate locations;
- A new 44 metre inscribed circle diameter (ICD) roundabout at the junction with the A3102, located at the existing private driveway which provides access to the equestrian centre;
- A new priority junction between the link road and Breach Lane, alongside the realignment of Breach Lane;
- A new 40 metre ICD roundabout at the junction with Marlborough Road, located at the edge of Royal Wootton Bassett, north of the sewage treatment works;
- Adjustment to the eastern arm of the Bincknoll Lane / Evening Star junction, with the link road connecting directly to the roundabout and the existing minor road forming a priority junction with the link road;
- New bridges across the rivers and railway line, with the route designed to cross these at the most appropriate locations; and
- New roundabouts strategically placed along the route to provide access to the development parcels.

2.1.4 The total length of the link road is approximately 4.5km, excluding the existing section of Bincknoll Lane which will join the link road to the A3102 to the northeast of Royal Wootton Bassett.

3 Existing Traffic Patterns in Royal Wootton Bassett

3.1 Traffic Surveys

3.1.1 To establish the existing patterns of traffic within Royal Wootton Bassett, ANPR surveys were undertaken on the 9th and 10th of October 2019 between 07:00 and 19:00. Six cordon surveys were undertaken (at sites 1, 2, 3, 6, 7 and 8), with an additional three screening surveys (at sites 4, 5 and 9), at the locations shown in Figure 2-1.

Figure 3-1: ANPR Surveys



3.2 Overall Traffic Volumes

3.2.1 The results of the ANPR surveys were interrogated to determine the current routes taken through Royal Wootton Bassett. Only journeys with a duration of less than 10 minutes were selected, to exclude those stopping within the town. The number of trips between each origin and destination are summarised in Table 3-1 and 3-2, which also show the percentage split.

Table 3-1: AM Peak – Origins and Destinations

Origin	Destination						Total Through	Internal
	01O	02O	03O	06O	07O	08O		
01I	15 (1%)	107 (7%)	263 (16%)	32 (2%)	9 (1%)	0 (0%)	425 (26%)	185
02I	83 (5%)	60 (4%)	90 (5%)	30 (2%)	63 (4%)	2 (0%)	327 (20%)	290
03I	209 (13%)	49 (3%)	29 (2%)	24 (1%)	60 (4%)	7 (0%)	376 (23%)	413
06I	19 (1%)	22 (1%)	56 (3%)	6 (0%)	3 (0%)	9 (1%)	114 (7%)	97
07I	62 (4%)	94 (6%)	185 (11%)	9 (1%)	8 (0%)	9 (1%)	365 (22%)	223
08I	1 (0%)	2 (0%)	8 (0%)	11 (1%)	1 (0%)	2 (0%)	24 (1%)	53
Total Through	387 (24%)	332 (20%)	630 (39%)	111 (7%)	144 (9%)	28 (2%)	1630 (100%)	
Internal	201	243	614	99	91	30		

Table 3-2: PM Peak – Origins and Destinations

Origin	Destination						Total Through	Internal
	01O	02O	03O	06O	07O	08O		
01I	14 (1%)	68 (4%)	228 (14%)	17 (1%)	43 (3%)	0 (0%)	370 (22%)	214
02I	75 (5%)	28 (2%)	58 (4%)	21 (1%)	79 (5%)	2 (0%)	262 (16%)	316
03I	267 (16%)	84 (5%)	36 (2%)	58 (4%)	177 (11%)	7 (0%)	627 (38%)	720
06I	20 (1%)	24 (1%)	24 (1%)	7 (0%)	7 (0%)	7 (0%)	88 (5%)	118
07I	27 (2%)	83 (5%)	159 (10%)	6 (0%)	9 (1%)	3 (0%)	286 (17%)	195
08I	4 (0%)	3 (0%)	3 (0%)	4 (0%)	3 (0%)	3 (0%)	18 (1%)	28
Total Through	405 (25%)	289 (17%)	507 (31%)	112 (7%)	317 (19%)	21 (1%)	1649 (100%)	
Internal	155	229	493	52	114	28		

3.2.2 The tables demonstrate that the route with the highest traffic flow is from site 1 to site 3 in the AM peak and from site 3 to site 1 in the PM peak. This is likely to be associated with traffic from the wider area accessing the M4 junction 16 or going to Swindon.

3.3 Routing of Traffic

3.3.1 The routing of traffic from each of the origin points is illustrated in more detail in Figures 3-2 to 3-7 for the AM peak and 3-8 to 3-13 for the PM peak. The numbers in brackets indicate the total number of vehicles travelling through each ANPR site from each origin across the two days (i.e. this represents double the daily average).

Figure 3-2: AM Peak, originating at 011

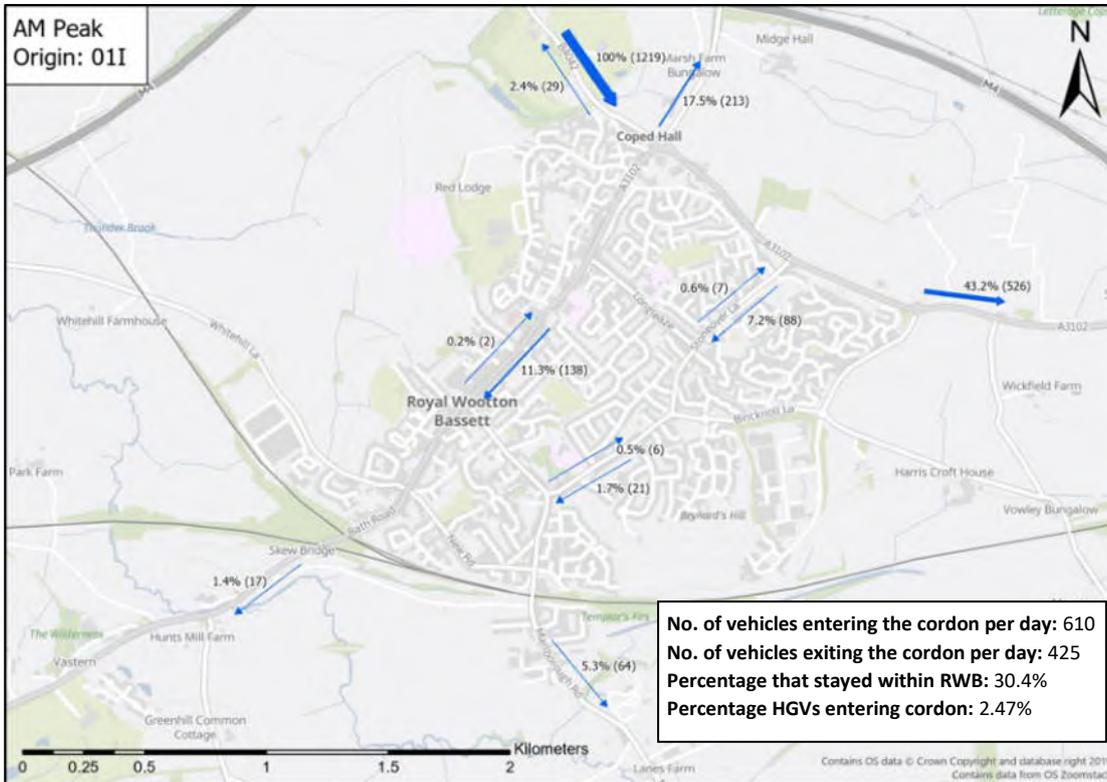


Figure 3-3: AM Peak, originating at 021

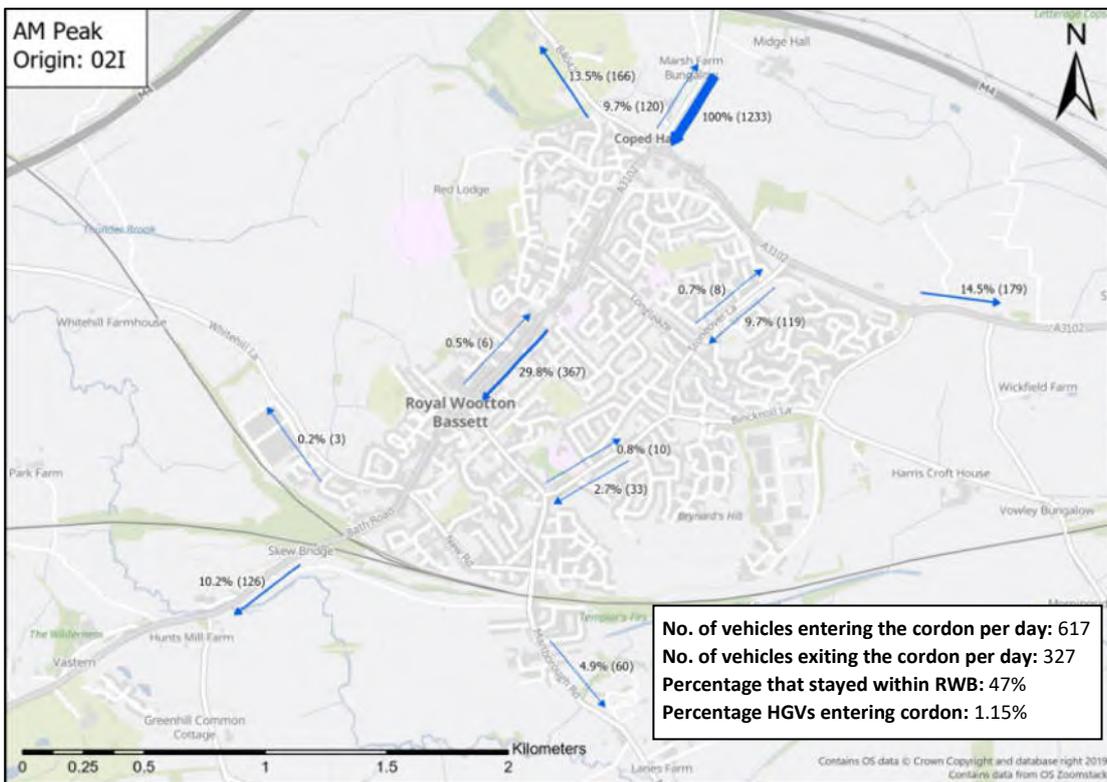


Figure 3-4: AM Peak, originating at 03I

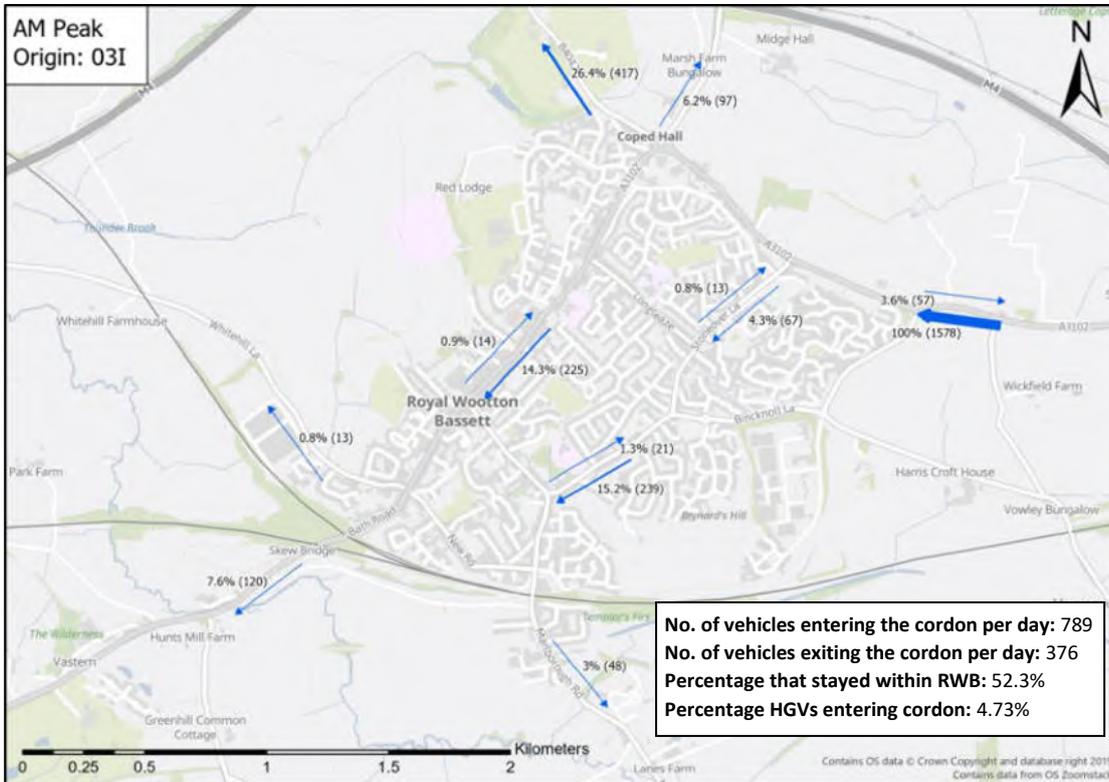


Figure 3-5: AM Peak, originating at 06I

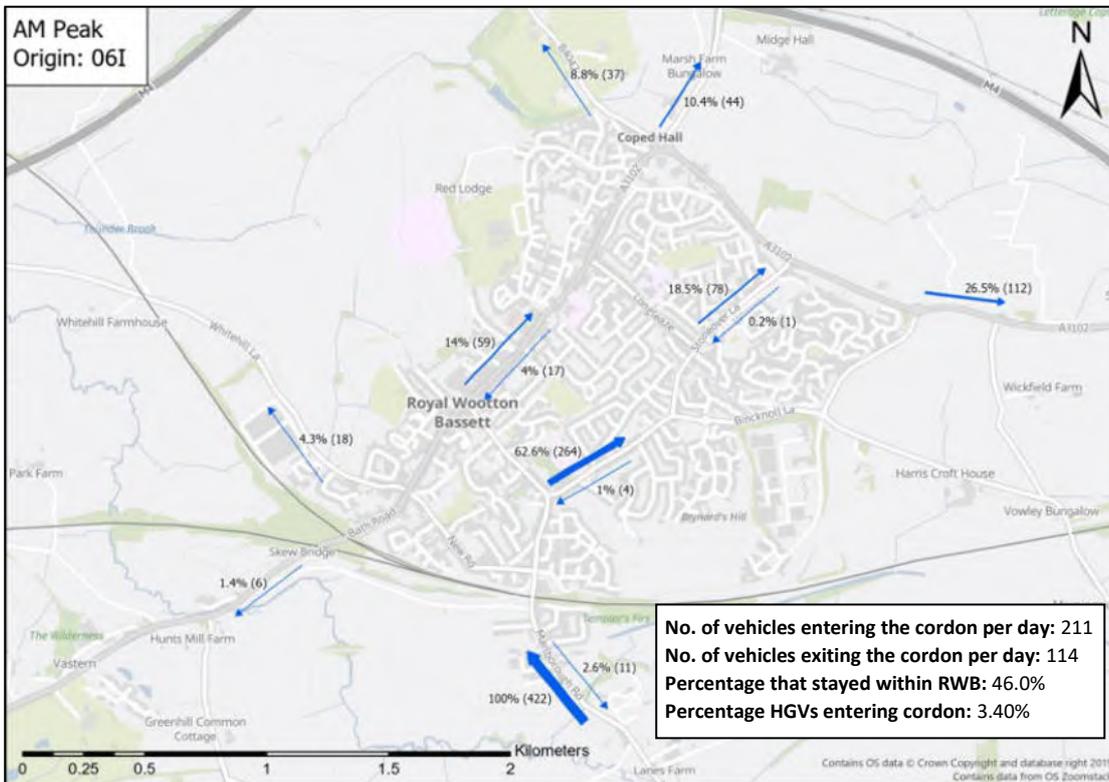


Figure 3-6: AM Peak, originating at 071

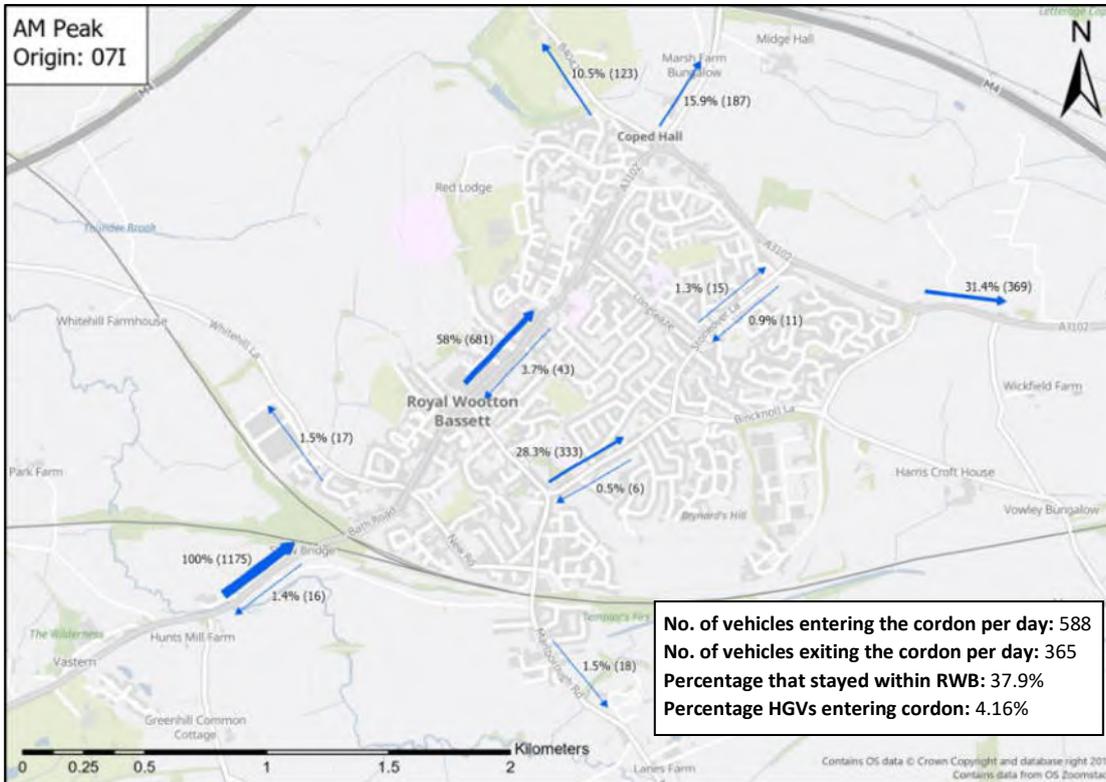


Figure 3-7: AM Peak, originating at 081

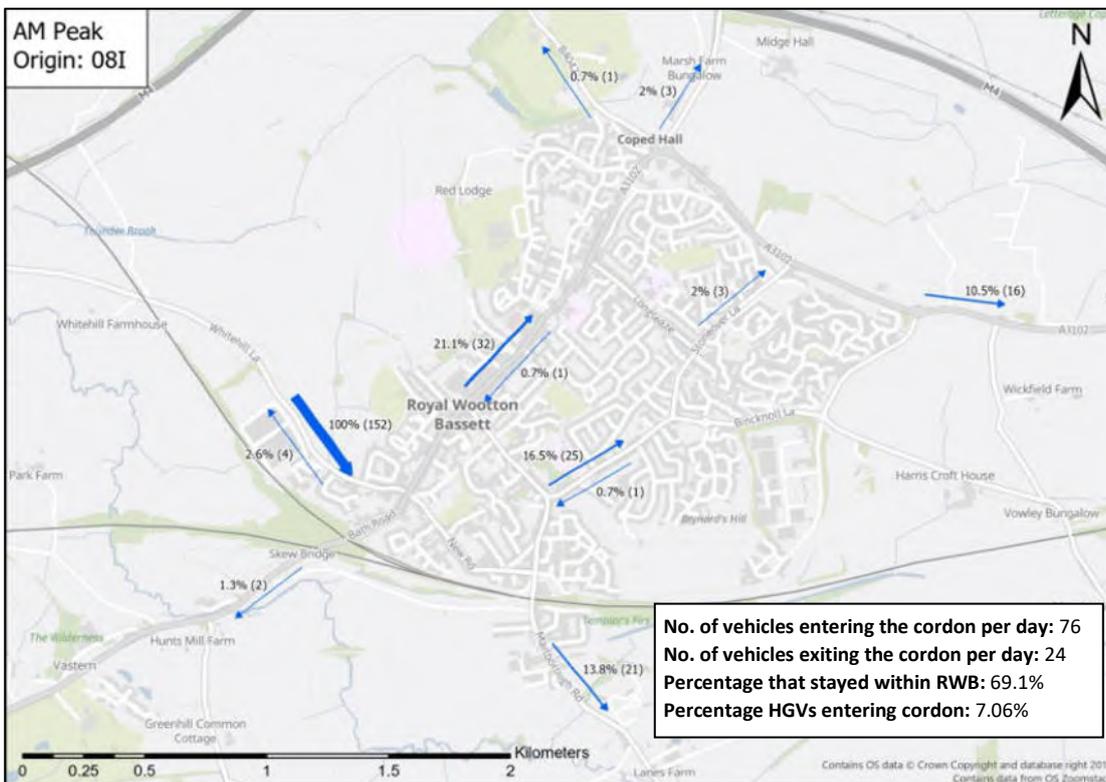


Figure 3-8: PM Peak, originating at 01I

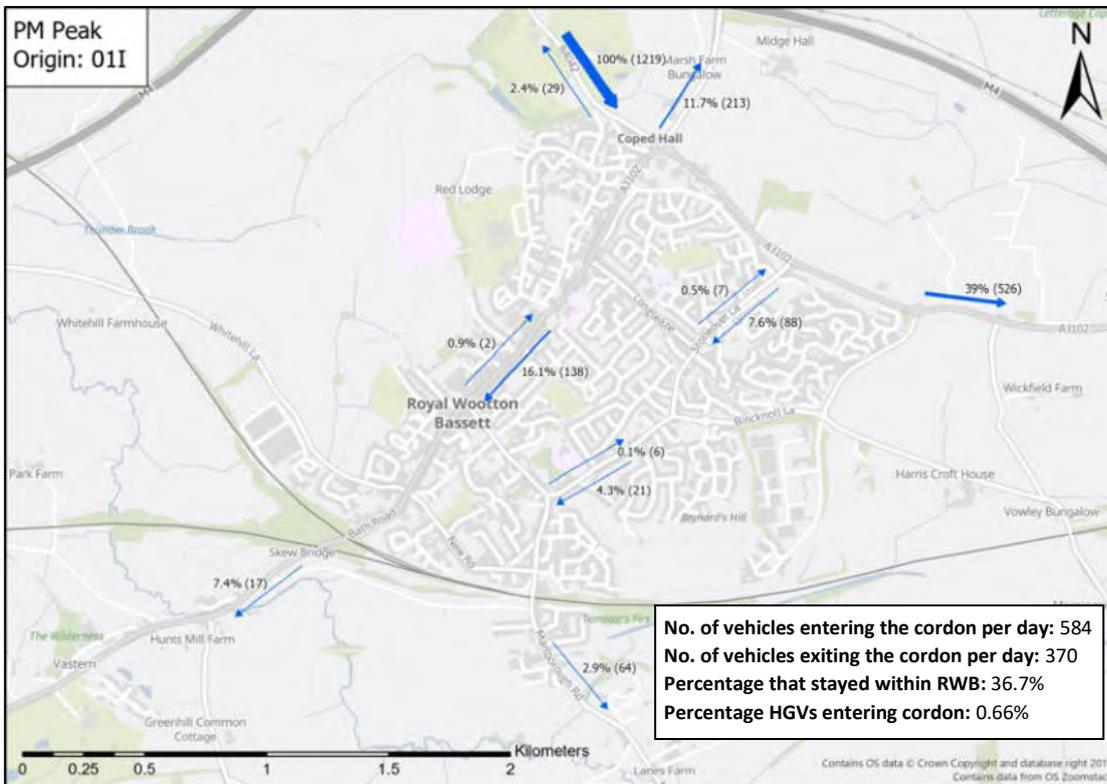


Figure 3-9: PM Peak, originating at 02I

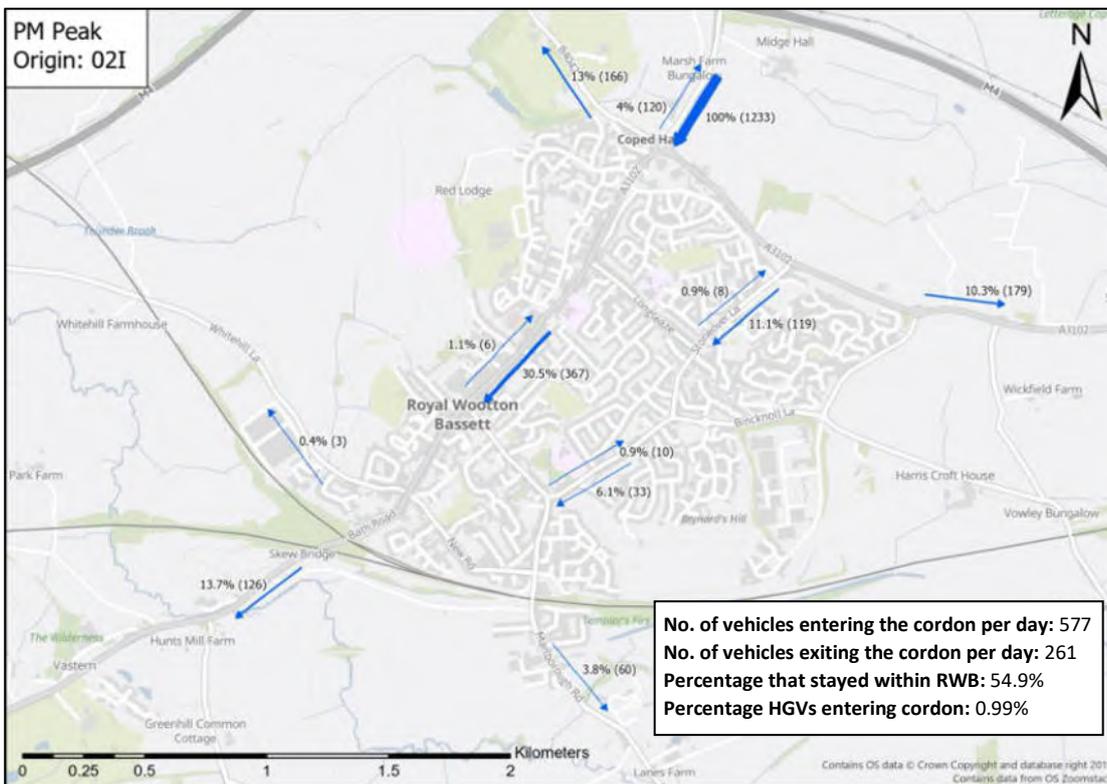


Figure 3-10: PM Peak, originating at 03I

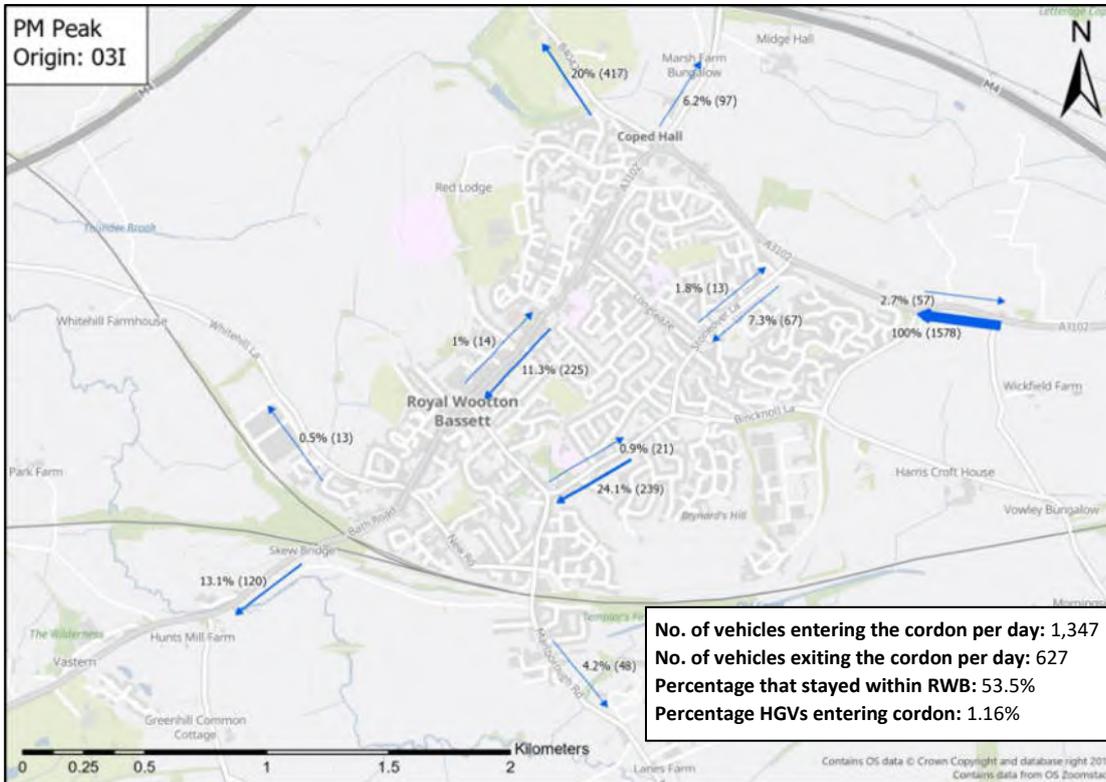


Figure 3-11: PM Peak, originating at 06I

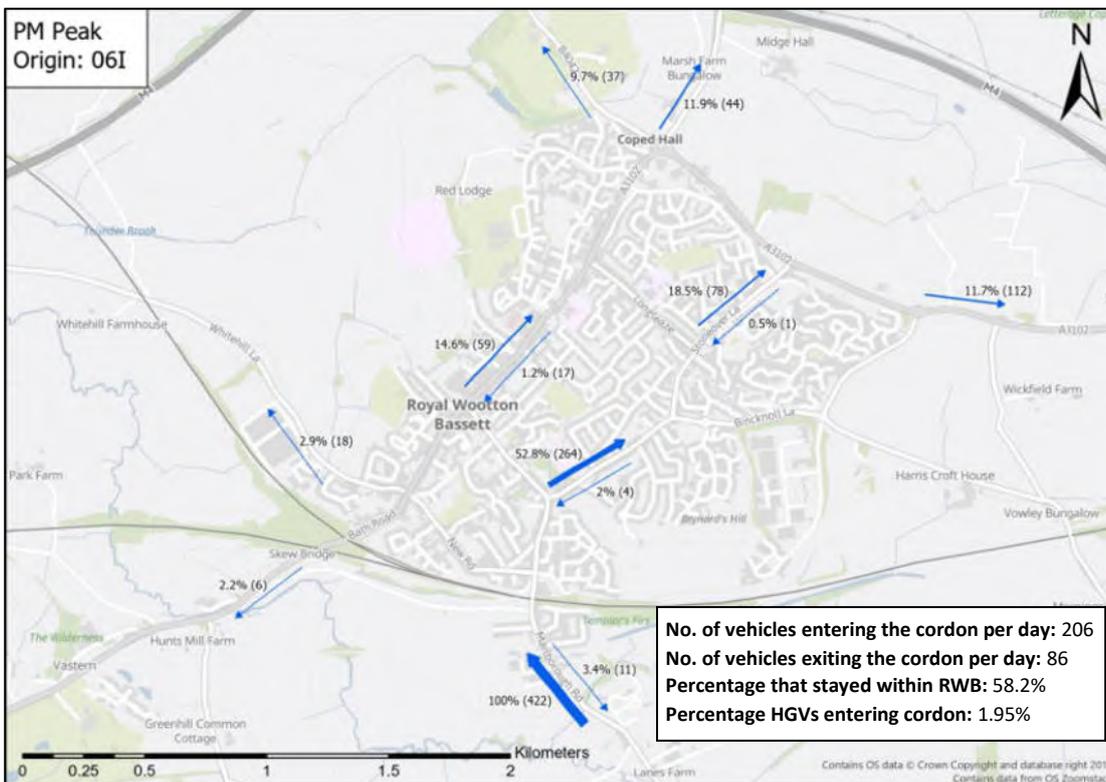


Figure 3-12: PM Peak, originating at 07I

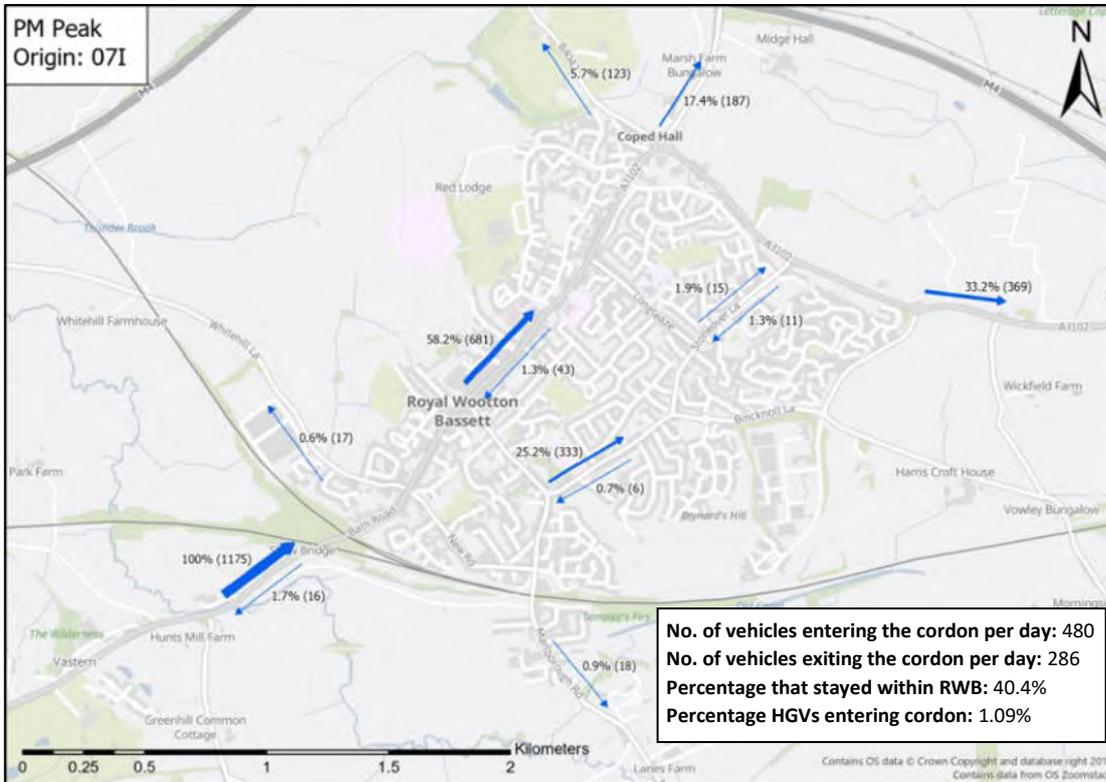
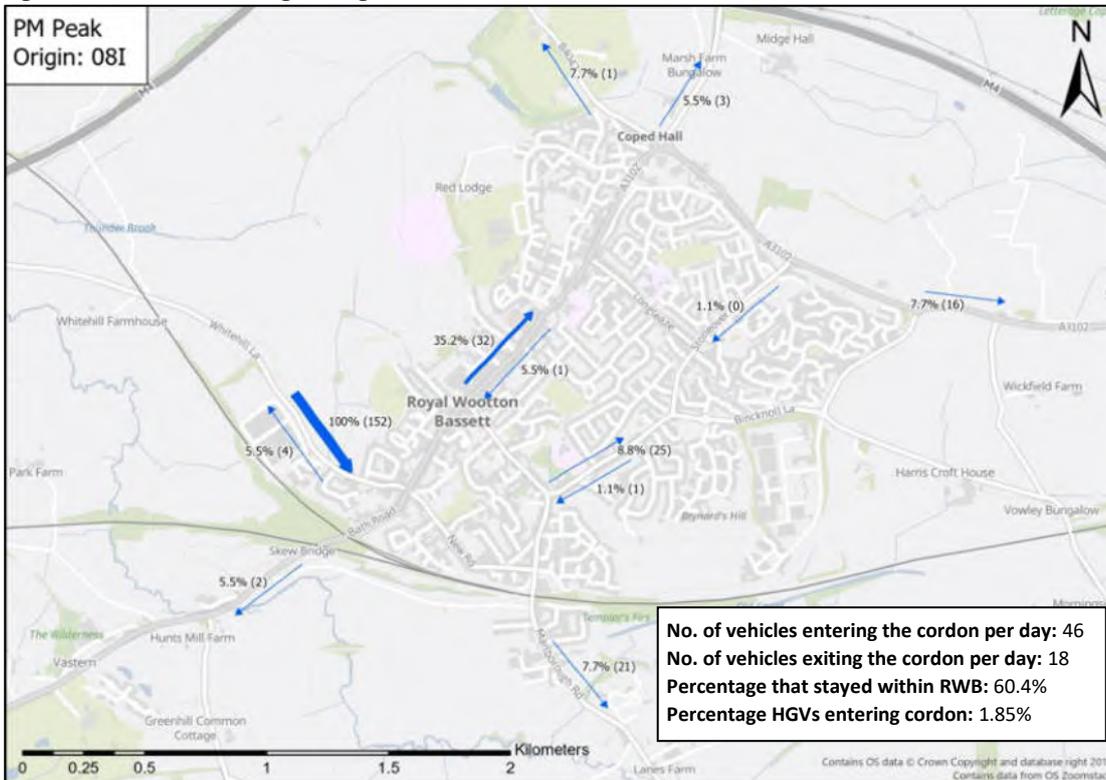


Figure 3-13: PM Peak, originating at 08I



AM Peak

3.3.2 Of the vehicles that enter Royal Wootton Bassett via site 7 in the AM peak, 31.4% route to the A3102 towards the M4 junction 16 (site 3), whilst of those that enter via site 3, 7.6% continue to site 7. A relatively small number of vehicles enter Royal Wootton Bassett via site 6, of which 26.5% route to site 3. This is the traffic that routes through Royal Wootton Bassett town centre at present, either along the A3102 or via Nore Marsh Road / Stoneover Lane / Bincknoll Lane, but does not stop for any length of time. It is this significant proportion of traffic that is likely to be reassigned to the link road.

PM Peak

3.3.3 Of the vehicles that enter Royal Wootton Bassett via site 7 in the PM peak, 33.2% route to site 3, whilst of those that enter via site 3, 13.1% continue to site 7. A relatively small number of vehicles enter Royal Wootton Bassett via site 6, of which 11.7% route to site 3. As for the AM peak, it is likely that this traffic would be reassigned to the link road in the PM peak.

3.4 Vehicle Speed and Journey Times

3.4.1 The journey times recorded by the ANPR survey between key origin-destination pairs are set out in Table 3-3. This table also sets out the average speed on each route, based on the speed and route length. It should be noted that these are average speeds along the length of the journey routes and actual speeds of traffic within the town centre itself are lower.

Table 3-3: ANPR Journey Times

	Distance (km)	AM Peak		PM Peak		Average Day	
		Average journey time (min)	Average speed (kph)	Average journey time (min)	Average speed (kph)	Average journey time (min)	Average speed (kph)
ANPR 3 to ANPR 6	3.392	4.44	46	3.94	52	4.09	50
ANPR 6 to ANPR 3	3.392	5.86	35	4.62	44	4.85	42
ANPR 3 to ANPR 7	4.705	6.09	46	6.10	46	5.79	49
ANPR 7 to ANPR 3	4.705	7.56	37	6.59	43	6.29	45
ANPR 2 to ANPR 6	3.196	5.55	35	5.55	35	5.13	37
ANPR 6 to ANPR 2	3.196	5.54	35	5.35	36	5.10	38
ANPR 1 to ANPR 6	3.754	6.06	37	5.90	38	5.56	41
ANPR 6 to ANPR 1	3.754	5.59	40	5.91	38	5.42	42
ANPR 6 to ANPR 7	2.865	4.49	38	3.53	49	3.57	48
ANPR 7 to ANPR 6	2.865	3.23	53	4.37	39	3.55	48

4.2.2 The town centre speeds used in the modelling were selected based on the ANPR journey times. As shown in Table 4-1, the existing GIS journey times were between the minimum ANPR journey times and the average ANPR journey times (excluding all journeys of more than 10 minutes). Whilst it is likely that this will include some trips with a short stop as part of the journey, it will ensure that any trips with longer stops are excluded from the assessment.

Table 4-1: Journey Time Comparison – Traffic Speeds

	ANPR Results – Journey Time (minutes) ¹				Existing journey time, from GIS (minutes)
	AM Peak – average	PM Peak – average	Daily – average	Daily – minimum	
ANPR 3 to ANPR 6	4.44	3.94	4.09	2.63	3.61
ANPR 6 to ANPR 3	5.86	4.62	4.85	3.27	3.61
ANPR 3 to ANPR 7	6.09	6.10	5.79	3.41	4.71
ANPR 7 to ANPR 3	7.56	6.59	6.29	3.96	4.71
ANPR 2 to ANPR 6	5.55	5.55	5.13	3.50	3.98
ANPR 6 to ANPR 2	5.54	5.35	5.10	3.39	3.98
ANPR 1 to ANPR 6	6.06	5.90	5.56	3.97	4.00
ANPR 6 to ANPR 1	5.59	5.91	5.42	3.5	4.00
ANPR 6 to ANPR 7	4.49	3.53	3.57	2.16	3.02
ANPR 7 to ANPR 6	3.23	4.37	3.55	2.37	3.02

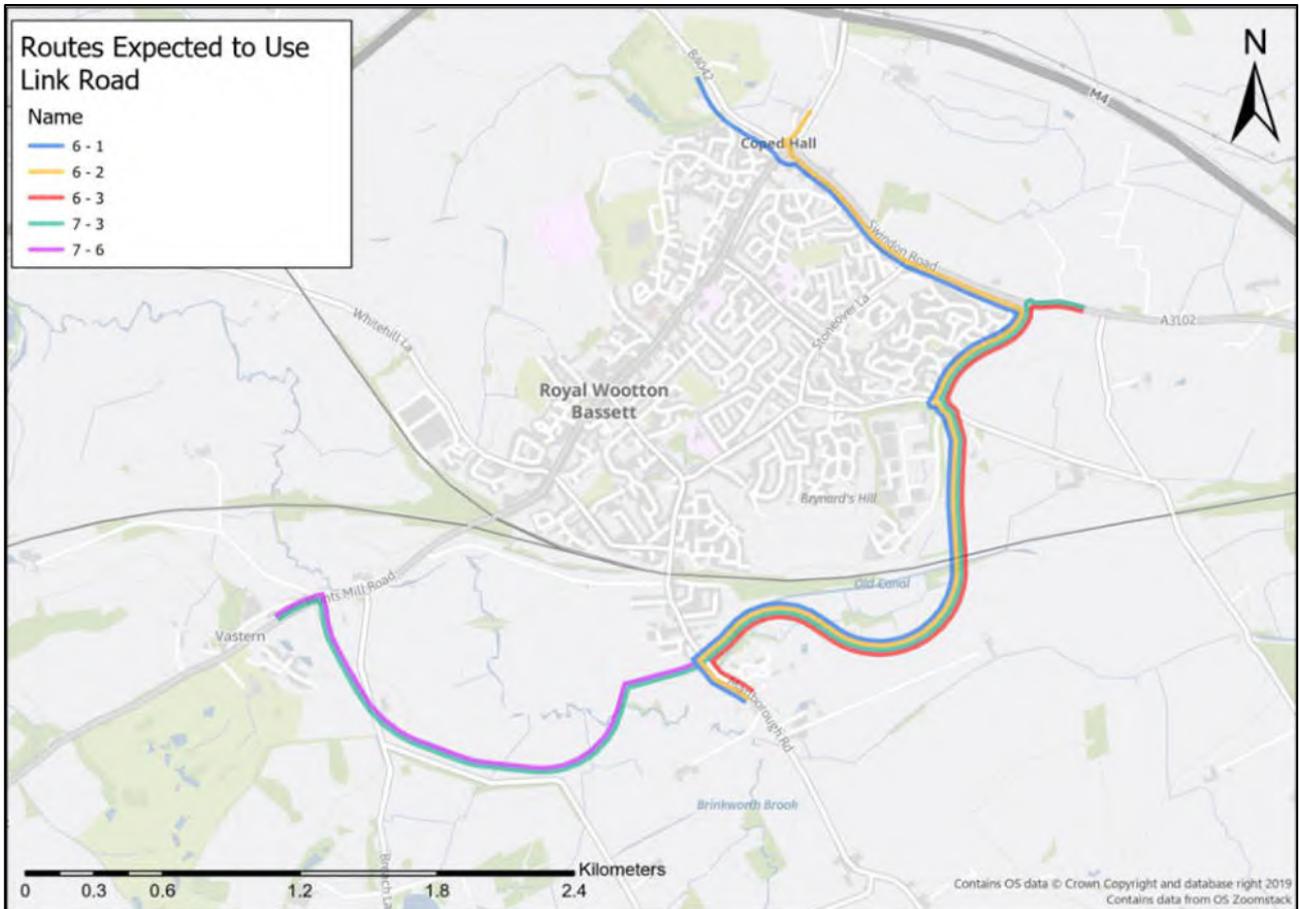
4.3 Impact of Link Road

4.3.1 By introducing the proposed link road into the GIS model, it is possible to see the likely reassignment effects. Whilst the proposed link road would likely result in slightly longer journeys for some routes in terms of distance, the uncongested nature of the purpose designed route would reduce journey times and therefore be attractive to drivers.

4.3.2 The link road would be used by vehicles currently travelling through Royal Wootton Bassett town. The journeys that are likely to be re-routed onto the link road are shown in Figure 4-2. This shows that there are five routes which would be reassigned onto the link road.

¹ Journeys <10 minutes only

Figure 4-2: Routes expected to use the proposed link road



Number of Vehicles

4.3.3 The number of vehicles using each route is set out in Table 4-2. This shows that the link road would provide benefit to 4,687 vehicles on an average weekday between 07:00 and 19:00. Table 4-2 further indicates that 439 existing trips could be diverted to the link road in the AM peak, and 512 existing trips could be diverted to the link road in the PM peak. The beneficial impact on Royal Wootton Bassett town centre would therefore be significant.

Table 4-2: Number of vehicles expected to re-route onto link road

	Average No. Vehicles Recorded		
	AM Peak	PM Peak	Daily (07:00 – 19:00)
ANPR 3 to ANPR 6	24	58	396
ANPR 6 to ANPR 3	56	24	364
ANPR 3 to ANPR 7	60	177	1349
ANPR 7 to ANPR 3	185	159	1852
ANPR 2 to ANPR 6	30	21	161
ANPR 6 to ANPR 2	22	24	165
ANPR 1 to ANPR 6	32	17	140
ANPR 6 to ANPR 1	19	20	154
ANPR 6 to ANPR 7	3	7	42
ANPR 7 to ANPR 6	9	6	66
Total	439	512	4687

4.3.4 Of the traffic entering Royal Wootton Bassett from each of the main roads, the percentages of through traffic expected to be diverted onto the link road is shown in Table 4-3.

Table 4-3: Percentage of traffic expected to use the link road

Entry Point	AM Peak		PM Peak	
	No. Through Vehicles	% Diverted To Link Road	No. Through Vehicles	% Diverted To Link Road
01	425	8%	370	5%
02	327	9%	262	8%
03	376	22%	627	37%
06	114	87%	88	85%
07	365	53%	286	58%

4.3.5 As set out in Table 4-3, 53% of through traffic entering Royal Wootton Bassett from site 7 (Hunts Mill Road) is expected to use the link road in the AM peak and 58% is expected to use the link road in the PM peak, whilst 87% of through traffic entering from site 6 (Marlborough Road) in the AM peak and 85% in the PM peak is expected to divert onto the link road.

4.3.6 The introduction of public realm improvements and traffic calming within the town centre would likely increase the proportion of trips on Hunts Mill Road diverting to the link road. Increasing the journey time through the town centre by implementing these measures will make the link road a more attractive route for those vehicles travelling from the south west to sites 1 and 2 which are routes to the north and west of the town. Based on current network conditions traffic on these routes is not anticipated to re-assign to the link road due to the additional distance.

Impact on the Town Centre

4.3.7 Sites 4 and 5 in the town centre recorded a total of 676 through vehicle movements in the AM peak and 751 through vehicle movements in the PM peak which did not stop within the town. The provision of the link road will therefore remove 65% of through vehicle movements in the AM peak and 68% of through traffic in the in the PM peak.

4.3.8 Including both through traffic movements and those that stop within Royal Wootton Bassett a total 2,100 two-way vehicle movements were recorded at sites 4 & 5 in the AM peak and 2,245 in the PM peak. Therefore, introducing the relief road would result in a 21% of total traffic in the AM peak, and 23% reduction in the PM peak.

Drive Time Comparison

4.3.9 For each of the routes which would use the new link road, a drive time comparison has been undertaken, as shown in Table 4-4.

Table 4-4: Journey Time Comparison

	As existing, from GIS (minutes)	With 40mph Link Road (minutes)	Total time saving (minutes)	
			AM Peak	PM Peak
ANPR 3 to ANPR 6	3.61	2.83	18.72	43.68
ANPR 6 to ANPR 3	3.61	2.83	43.68	18.72
ANPR 3 to ANPR 7	4.71	4.69	1.20	3.52
ANPR 7 to ANPR 3	4.71	4.69	3.69	3.19
ANPR 2 to ANPR 6	3.98	3.90	2.40	1.76
ANPR 6 to ANPR 2	3.98	3.90	1.76	1.96
ANPR 1 to ANPR 6	4.00	3.99	0.32	0.17
ANPR 6 to ANPR 1	4.00	3.99	0.19	0.20
ANPR 6 to ANPR 7	3.02	2.34	2.04	3.06
ANPR 7 to ANPR 6	3.02	2.34	6.12	3.06

4.4 Development Traffic

4.4.1 The estimated distribution of development traffic has been calculated based on 2011 Census Journey to Work data for Royal Wootton Bassett. Separate distributions of traffic have been calculated for the employment and residential elements of the development with the resultant distributions summarised in Table 4-5. The routes highlighted with bold text are those that it is assumed would use the link road rather than travel through the town centre.

Table 4-5: Distribution of Development Trips

Destination	Employment	Residential
A3102 Hunts Mill Lane	34.4%	31.7%
Marlborough Road	2.1%	1.2%
A3102 towards M4 J16	31.6%	42.1%
Towards Hook	11.8%	5.5%
B4042 west	4.9%	5.2%
Whitehill Lane	3.9%	4.8%
Internal to Royal Wootton Bassett	11.3%	9.6%
Total	100%	100%

4.4.2 From the information presented above approximately 85% of trips associated with both the employment and residential development would not travel through the town centre and would instead use the proposed link road or Hunts Mill Road / Marlborough Road for destinations to the south of the town.

4.4.3 It is expected that trips through Royal Wootton Bassett town centre would be limited to any internal trips to the town centre only.

5 Summary and Conclusions

5.1.1 This Technical Note has been prepared by PJA on behalf of Savills to assess the impact of providing a new link road to the south of Royal Wootton Bassett.

5.1.2 GIS modelling has been undertaken based on data collected through ANPR surveys, which has demonstrated that a link road would reduce the journey time on a number of key routes resulting in a significant reassignment of trips away from the town centre. It is anticipated that through traffic in the town centre (i.e. vehicles that do not stop at a destination within the town) will reduce by 65% in the AM peak and 68% in the PM peak. Total traffic in the town centre will reduce by 21% in the AM peak and 23% in the PM peak and remove in excess of 4,600 vehicle trips per day from routing through the town.

5.1.3 The provision of the link road would also mean that 85% of trips associated with the proposed development would not impact on the existing road network within the town.

5.1.4 The key benefits associated with the provision of the link road would include:

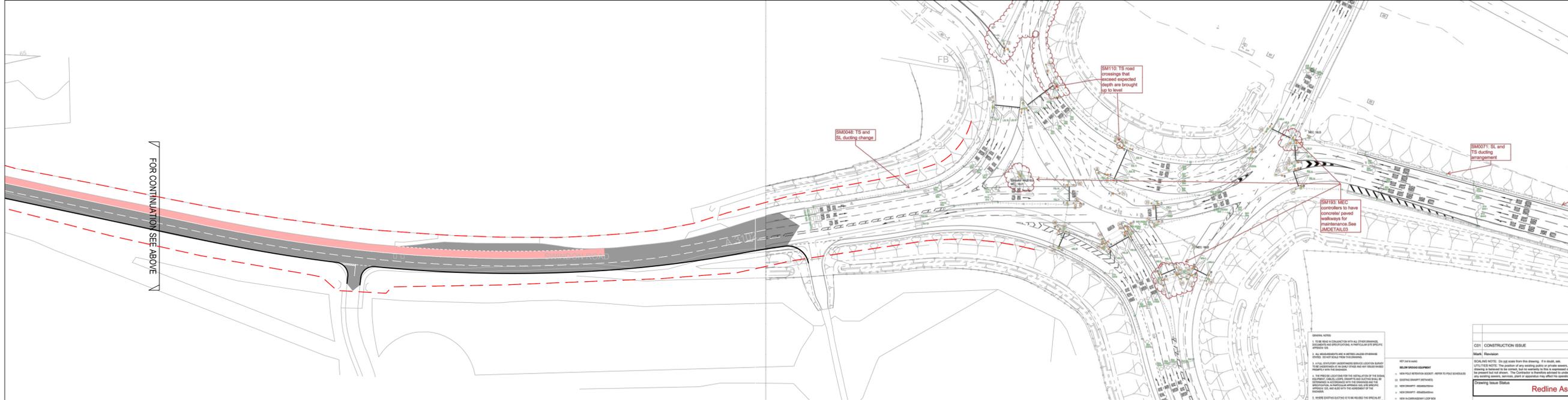
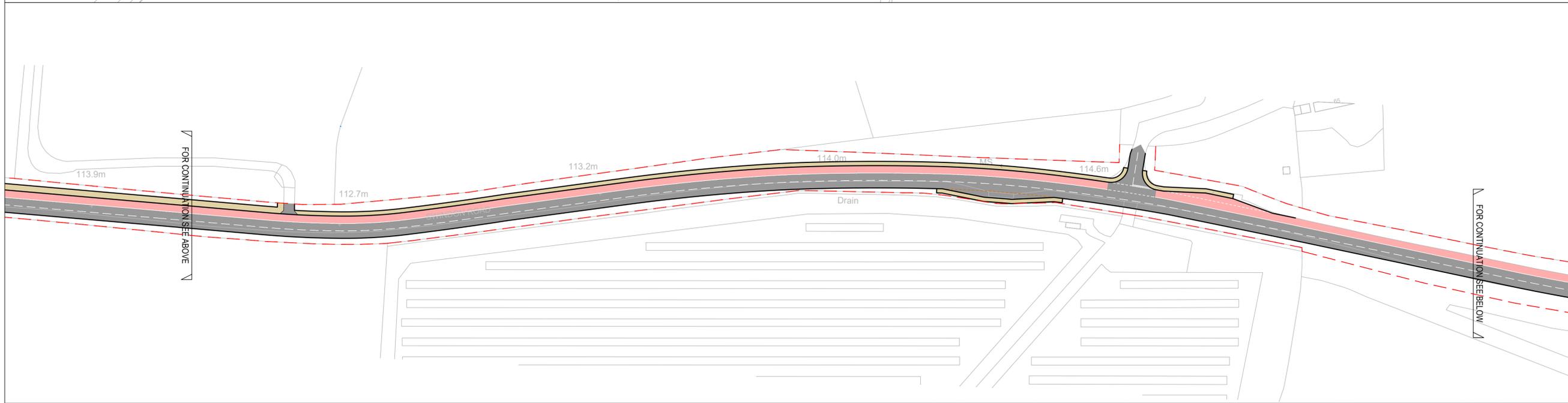
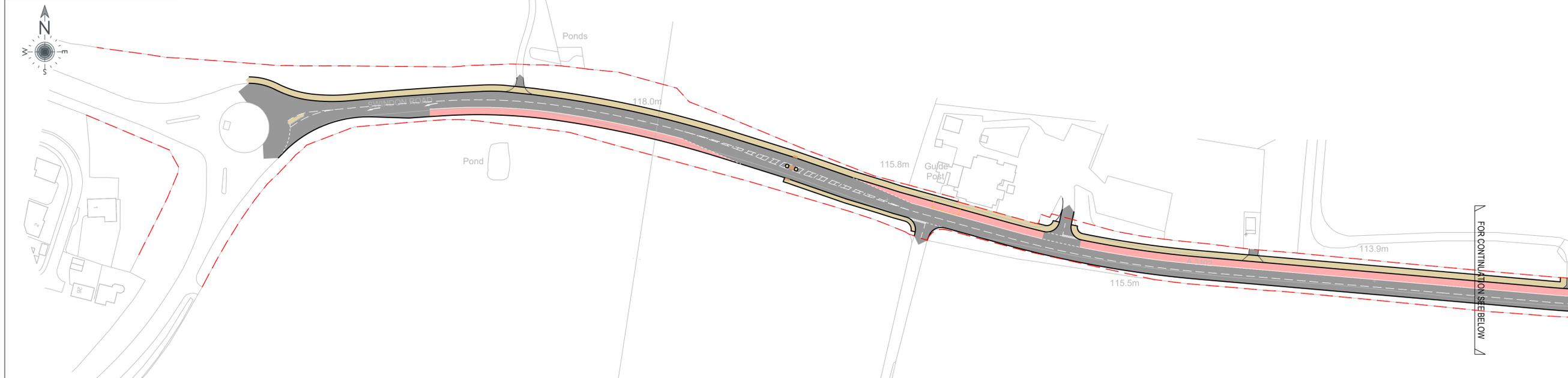
- Reduced journey times for those currently routing through Royal Wootton Bassett.
- Reduced vehicle flows through Royal Wootton Bassett town centre, offering the opportunity for public realm improvements or the installation of traffic calming to further reduce speeds and decrease the attractiveness of this route for motor vehicles.

- Improved air quality within Royal Wootton Bassett town centre.
- Reduced potential for collisions in Royal Wootton Bassett town centre.
- Reduction in traffic noise in Royal Wootton Bassett town centre.
- Growth of the town through employment and housing development, which would help support local services and amenities.
- Improved access to / from the M4 via junction 16.
- The ability to facilitate development without exacerbating existing congestion issues within the town.

5.1.5 In summary, the link road would provide a considerable benefit to the town, improving the town centre environment whilst facilitating new development.



Appendix C A3102 Proposed Bus Improvement Scheme



NOTES

These drawings have been produced with reference to the CDM Regulations 2015. Please note that these are pre-construction phase drawings and should be subject to further design risk management as required in accordance with Regulation 9

Legend
 --- Highway Boundary

PI	21.01.21	Addition of Highway Boundary Information	GS
PO	12.01.21	First Issue	GS
REV	DATE	REVISION NOTE	BY
<p>PJA The Aquarium - King Street Reading - RG1 2AH Tel: 0118 956 0909 Birmingham - Bristol Exeter - London - Reading pja.co.uk</p>			
<p>Savills</p>			
<p>PROJECT Land South of Royal Wootton Bassett</p>			
<p>DRAWING TITLE A3102 Proposed Bus Improvement Scheme</p>			
<p>DRAWING ISSUE STATUS INFORMATION</p>			
<p>PJA JOB No. SUB-CODE 04028 - TR - 003 - PI</p>			
<p>Revision Letter: P - Prelim / A - Approval / T - Tender / C - Construction 01 DRAWING REFERENCE</p>			
<p>CONSTRUCTION ISSUE</p>			
<p>Scale: 1:1,000 Drawn: GS Reviewed: MF Date: 21/01/2021</p>			

RWB56d

Strategic Overview of Environmental Issues

All projects
great
and small.



Tyler
Grange

Land West of Maple Drive, Royal
Wootton Bassett

9th March 2021

TG Report No. 13750_R01_LT_HM

Report No:	Date	Revision	Authors	Checked
13750_R01	9 th March 2021	-		

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Appendix:

Appendix 1: BS5837 Cascade Chart for Tree Quality Assessment

Plans:

13750/P01: Landscape Character – National, County and District Context

13750/P02: Viewpoint Location Plan

13750/P03: Photosheets

13750/P10: Combined Opportunities and Constraints



Section 1: Introduction and Context

Introduction

- 1.1. This briefing note has been prepared by Tyler Grange Group Limited, instructed by Savills on behalf of TOF Corporate Trustee Limited, in respect of a parcel of land at Maple Drive, Royal Wootton Bassett, Wiltshire (hereafter referred to as 'the site'). The site is centred around OS grid reference SU068835.
- 1.2. This report provides the findings of preliminary desktop studies and fieldwork with respect to natural and cultural assets to determine, at a strategic level, the potential issues associated with development of the Site. The constraints these impose on development and the opportunities to enhance the local area and make a positive contribution to the existing and new communities are described.
- 1.3. The natural and cultural assets considered in this report, together with the relevant are as follows:
 - Agriculture Section 2
 - Arboriculture Section 3
 - Heritage Section 4
 - Ecology Section 5
 - Landscape Section 6

Context

- 1.4. The site lies on the north-western boundary of the town of Royal Wootton Bassett (RWB). It comprises two arable fields and an area of grassland and scrub to the east (see **Figure 1**). The site is bounded by hedgerows and mature tree lines and there are patches of scrub throughout the grassland section to the east and along the boundaries. A woodland and lake lie adjacent to the eastern boundary, open countryside to the west, with the town of RWB lying to the south and west.





Figure 1: Site boundary and surrounding area.



Section 2: Agriculture

Planning Policy

- 2.1 National planning policy guidance on development involving agricultural land is set out in National Planning Policy Framework (NPPF), which was revised on the 19th February 2019. The NPPF aims to provide a simplified planning framework which sets out the Government’s economic, environmental and social planning policies for England. The NPPF includes policy guidance on ‘Conserving and Enhancing the Natural Environment’ (Section 15).
- 2.2 Paragraph 170 (a and b) (page 49) are of relevance to this assessment of agricultural land quality and soil and state that:
- “Planning policies and decisions should contribute to and enhance the natural and local environment by:*
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;...”*
- 2.3 Paragraph 171 of the NPPF (2019) goes on to describe that:
- “Plan should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵³ ...”*
- 2.4 Footnote number 53 states that:
- “Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”*
- 2.5 The Wiltshire Council Core Strategy (Adopted January 2015) includes Core Policy 51 ‘Landscape’ which states (inter alia) ‘...proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures’, including ‘iv. Visually sensitive skylines, soils, geological and topographical features’.
- 2.6 There is no Core Policy for development involving the Best and Most Versatile (BMV) agricultural land. In this case, consideration should be given to relevant national policy (see above).



Survey Methodology

- 2.7 This assessment is based upon the findings of a study of published information on climate, geology and soil. It follows the approach of the Ministry of Agriculture, Fisheries and Food (MAFF)¹ 'Agricultural Land Classification of England and Wales: Revised Guidelines and Criteria for Grading the Quality of Agricultural Land', October, 1988 (henceforth referred to as the 'the ALC Guidelines').
- 2.8 The ALC system provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. The ALC system divides agricultural land into five grades (Grade 1 'Excellent' to Grade 5 'Very Poor'), with Grade 3 subdivided into Subgrade 3a 'Good' and Subgrade 3b 'Moderate'. Agricultural land classified as Grade 1, 2 and Subgrade 3a falls in the 'best and most versatile' category in Paragraph 170 and 171 of the NPPF revised in February 2019. Further details of the ALC system and national planning policy implications are set out by Natural England in Technical Information Note 049².
- 2.9 The Department for Environment, Food and Rural Affairs (Defra) has published 'Safeguarding our Soils – A Strategy for England' (24th September 2009). The Soil Strategy was published in tandem with a 'Code of Practice for the Sustainable Use of Soils on Construction Sites'³. The Soil Strategy for England, which builds on Defra's 'Soil Action Plan for England (2004-2006)', sets out an ambitious vision to protect and improve soil to meet an increased global demand for food and to help combat the adverse effects of climate change.

Agricultural Features

- 2.10 The site is underlain by limestone in the Stanford Formation. The agricultural land at the site is likely to be well drained (i.e., Sherborne Association), and restricted to Subgrade 3a or Subgrade 3b, depending on the severity of a soil droughtiness limitation. This is dependent upon the depth of soil over limestone and the amount of limestone brash in the soil.

Opportunities and Constraints

- 2.11 With regard to mitigation for the for the loss of some agricultural land at the Site, and disturbing the soil thereon, current best practice on the sustainable use of soil on construction sites should be considered. Opportunities exist to strip and store soil resources (i.e., topsoil and subsoil) onsite for re-use in residential gardens, landscaping areas and open space. The sustainable use of soil as part of construction at the Site could be achieved through a suitably worded condition of planning permission, as recommended in Defra's Code of Practice (2009).

Conclusions

- 2.12 It is possible that better drained agricultural land developed over limestone (i.e., Sherborne Association) off Maple Drive could contain Best and Most Versatile (BMV) agricultural land, most likely in Subgrade 3a. With regard to the NPPF (2019), "...Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality".

¹ The Ministry of Agriculture, Fisheries and Food (MAFF) was incorporated within the Department for Environment, Food and Rural Affairs (Defra) in June 2001

² Natural England (December, 2012). 'Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049)'. Available online @ <http://publications.naturalengland.org.uk/publication/35012> Last accessed March 2021

³ Department for Environment, Food and Rural Affairs (September, 2009) 'Code of Practice for the Sustainable Use of Soils on Construction Sites'. Available online @ <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>. Last accessed March 2021



Section 3: Arboriculture

Planning Policy

- 3.1. Under the Town and Country Planning Act 1990 (as amended) the requirement to consider trees as part of development is a material planning consideration and will be taken into account in the determination of planning applications. Applicable arboricultural planning policy that relates to the site is set out below at a National and Local level.
- 3.2. At a national level, the consideration for trees is recognised in the context of their contribution to green infrastructure and biodiversity networks (Paragraph 170, 171 and 174 of the NPPF), and also in terms of their contribution in landscape terms to the local setting and character (Paragraph 170 of the NPPF). Great weight is applied to the importance of conserving existing aged trees, including ancient woodland and trees and trees considered to be ‘veterans’ (Paragraph 175 of the NPPF). No ancient woodland, ancient trees or veteran trees were identified within influence of the site and therefore para 175 is not considered applicable at this time as it relates to these features.
- 3.3. As part of the Wiltshire Core Strategy (adopted in 2015), Core Policy 50 (Biodiversity and Geodiversity) states that *“development proposals must demonstrate how they protect features of nature conservation as part of the design rationale”*. It goes further, stating that *“where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable on circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measure can be secured to ensure no net loss of the local biodiversity resource, and secure integrity of local ecological networks and provision of ecosystem service”*.
- 3.4. Core Policy 52 (Green Infrastructure (GI)) states that: *“development proposals should make provision for the retention and enhancement of Wiltshire’s Green Infrastructure network. If damage or loss of existing Green Infrastructure is unavoidable, the creation of new or replacement Green Infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the Green Infrastructure network, will be required.”*

Survey Methodology

- 3.5. The site walkover comprised an initial appraisal guided by BS5837:2012 to determine the quality and value of the trees present but did not constitute a fully detailed tree quality survey at this stage. Tree locations have been approximated using measurements during the tree survey and informed by aerial photography. The overall arrangement of tree cover, including tree grading value, is illustrated on the Combined Opportunities and Constraints Plan (TG Ref: 13750/P10)
- 3.6. The trees surveyed were visually inspected from ground level only and the value of trees has been assessed in accordance with the BS5837 Cascade Chart for Tree Quality Assessment (See **Appendix 1**).

Arboriculture Features

- 3.7. The walkover identified one tree of high value (Category A); one tree and eight groups of trees of moderate value (Category B) and three trees, three groups of trees and three hedgerows of low value (Category C). The majority of this existing tree cover is located on the boundaries of the site with the exception of three small-stature trees that run alongside the internal access track.



- 3.8. The high value tree is a mature Ash established offsite to the north. The moderate value trees are typically valued higher as a collective feature with individuals of lesser value. Species include Ash, Field Maple, Hazel, Horse Chestnut, Hybrid Black Poplar, Leyland Cypress and Sycamore. These range in age class from early mature to mature. The Leyland Cypress and Hybrid Black Poplar trees are established in the south-east corner and along the southern boundary and range in height from 12-18 metres.
- 3.9. The low value trees are typically small-stature hedgerow species (Blackthorn, Hawthorn, Hazel, Elder) established on the boundaries and young trees established on the eastern boundary (Cherry and Horse Chestnut). Three multi-stem standalone Hawthorn trees are scattered along the internal access track. These are mature and approximately 3 metres in height.
- 3.10. No trees onsite are subject to a Tree Preservation Order, Ancient Woodland or Conservation Area designation and no ancient or veteran trees were identified during the survey.

Opportunities and Constraints

- 3.11. The site's principal arboricultural features are established on the boundaries and include a mixture of early-mature to mature trees of high to moderate value alongside some sections of mature hedgerow and scattered amenity trees adjacent to the residential development. Such features at the boundaries can be safeguarded via sufficient development offsets that consider the root protection areas, canopies and shading cast by the trees. For instance, the high ash tree located offsite, has a potential Root Protection Area (RPA) of 14.4 metres.
- 3.12. Potential future development on the site should avoid Root Protection Areas of trees, and the potential impacts of tree shading across new development areas. The tree group at the southern boundary in particular has the potential to cause some shading implications due to its location and height. Suitable development buffers, including rear gardens if possible, should be provided adjacent to this feature to avoid social pressures to remove or cut back the trees.
- 3.13. There is an opportunity to strengthen the boundary vegetation and tree cover, particularly the northern and eastern boundaries, to improve the landscape / Green Infrastructure framework of the site.

Future Work

- 3.14. Should the site be considered for a future planning application, the implementation of a full BS5837:2012 Tree Quality Survey is recommended. This should inform any detailed design scheme and demonstrate compliance with local planning policy.
- 3.15. A full BS5837:2012 Tree Quality Survey will need to be based on measured topographic survey data in order to obtain accurate locations of trees and the associated design constraints. This in turn would inform the definitive development offsets, boundary treatments and design implications with respect to arboriculture.

Conclusion

- 3.16. Our initial appraisal of the site finds that there are no major issues, as far as existing trees are concerned, that affect the principle of development on the site. The areas of mature tree cover at the boundaries will need to be safeguarded which can be achieved through further survey and layout design work.



Section 4: Heritage

Planning Policy

- 4.1. The 1990 Planning (Listed Buildings and Conservation Areas) Act confirms that, in reaching planning decisions, the local planning authority should have special regard to preserving listed buildings and their settings, as well as the character and appearance within conservation areas.
- 4.2. The NPPF defines 'heritage assets' as any aspect of the historic environment which is of such significance that it is a material consideration in planning decisions. It is noted that any harm or loss should require clear and convincing justification, with 'substantial harm' to or loss of designated heritage assets of the highest significance (Grade I and II*) 'wholly exceptional' and 'exceptional' for Grade II listed buildings and conservation areas (Paragraph 194).
- 4.3. Where 'less than substantial harm' to the significance of a designated heritage asset may be caused, the harm should be weighed against the public benefits of the proposal. Paragraph 197 notes that effects on the significance of non-designated heritage assets, including most archaeological remains, require a balanced judgement weighing the scale of impact on the significance of the heritage asset against the benefits of the proposed development. Where heritage assets are to be lost. Paragraph 199 confirms that an appropriate record of the elements to be lost should be provided for.

Survey Methodology

- 4.4. For previous surveys undertaken for the western section of the site, Wiltshire Historic Environment Record (HER) and archives in Trowbridge were originally consulted as was the Historic England Archive in Swindon. These and online sources informed site walkovers. More recently, TG has been instructed to also consider land south east of RWB. Wiltshire Historic Environment Record (HER) and online sources informed a site walkover of the south eastern area and its environs in February 2021. New HER data was also secured for the area to the south west.

Heritage Baseline (Summary)

- 4.5. Extant hedgerows should be retained where possible, including one within the site between the northern two fields. A concentration of prehistoric flint has also been identified in the centre of the site during past research fieldwork (see **Plan 13750/P01** for locations). These artefacts have been interpreted as indicating a Mesolithic temporary camp, albeit plough damaged. Other such sites on higher ground are known in the county and it is unlikely to rate as of greater than county significance. No other heritage features or archaeological sites have been identified within the site, although a medieval farm may have lain to the east.

Opportunities and Constraints

- 4.6. In accordance with current policy and practice, further archaeological investigation will be required ahead of planning permission being granted. Fieldwork might include geophysical survey and trial trenching. This would confirm the nature and significance of the prehistoric remains and any other sub-surface features within the site.



- 4.7. It is most likely that any remains could consequently be investigated in advance of construction to ensure compliance with policy. If the concentration of flintwork is proven to be of greater than county significance, there may be a need to preserve this area under open space. However, work to date suggests the area of activity has been and continues to be disturbed by ploughing which will have lessened its significance and makes 'preservation by record' more appropriate.
- 4.8. The site lies at some distance from the historic core of the town and the corresponding conservation area. Listed buildings also all lie at some distance and level topography and intervening vegetation and buildings suggest the site's development would have no effect on any designated heritage asset's significance or an appreciation of that significance.

Conclusion

- 4.9. In conclusion, no heritage issues that would affect the principle or quantum of development have been identified. There is every reason to expect that allocation and future development of the site could accord with relevant planning policy and legislation that seeks to protect and enhance heritage resources and their settings.



Section 5: Ecology

Planning Policy

- 5.1. Section 15 of the NPPF (paragraphs 170 to 177) considers the conservation and enhancement of the natural environment. In summary, planning and decisions should:
- Contribute to and enhance the natural and local environment;
 - distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries; and
 - Protect and enhance biodiversity and geodiversity.
- 5.2. Core Policy 50 (Biodiversity and Geology) of the Wiltshire Core Strategy⁴ (adopted in 2015) describes how developments must “*demonstrate how they protect features of conservation and geological value as part of the design rationale*”. It goes further, stating “*an expectation that such features be retained, buffered and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term*”. In addition, there is a requirement to provide biodiversity enhancement, particularly within larger developments, which will contribute to the conservation objectives and targets of the Biodiversity Action plan (BAP) and/or the relevant River Basin/Catchment Management Plan.
- 5.3. Core Policy 52 (Green Infrastructure (GI)) states, amongst others, a requirement for the retention and enhancement of existing onsite GI, appropriate measures to ensure long-term management of GI related to the development, appropriate contribution towards the delivery of the Wiltshire Green Infrastructure Strategy⁵ and provision of opportunities to enhance natural linkages throughout Wiltshire.
- 5.4. Item ii of Core Policy 57 (Ensuring high quality design and place shaping) states “*the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development*”.

Survey Methodology

- 5.5. A desk-based study was conducted whereby records of designated sites and records of protected and priority species were purchased and interrogated for the site and its environs. The following resources were consulted / contacted:

⁴ <https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wcs.pdf?m=637099399373530000>

⁵ https://cms.wiltshire.gov.uk/documents/s156001/GI_slides.pdf



- Multi-Agency Geographic Information for the countryside (MAGIC) website⁶;
- Wiltshire & Swindon Biological Record Centre (WSBRC);
- Joint Nature Conservation Committee (JNCC) website;
- Natural England (NE) designated sites website;
- Ordnance Survey mapping; and
- Google Maps, including aerial photography and Google StreetView.

5.6. The following areas of search around the red line boundary of the site (red line shown on **Plan 13750/P10**) were applied:

- 1km for protected and priority species;
- 2km for non-statutorily designated sites;
- 5km for statutorily designated sites (excluding European sites); and
- 10km for European statutory sites.

5.7. A site visit was undertaken on 22nd February 2021. An ‘extended’ Phase I habitat survey where habitats and dominant plant species were identified and mapped was undertaken. The methods used during the walkover surveys broadly followed methods outlined in the JNCC Phase I habitat survey handbook⁷. This technique provides an inventory of the habitat types present and dominant species.

5.8. During the site visit, any evidence or potential for protected/priority fauna was also identified, including any evidence of badger and assessing tree for bat roosting potential. A Habitat Suitability Index (HSI) assessment of all ponds onsite and adjacent to the boundaries (where possible) was also undertaken.

5.9. The weather conditions during the survey were mostly dry with light rain at the beginning of the day, with a calm wind and a temperature of 7°C.

Limitations

5.10. The survey undertaken was a high-level survey. As such, the habitats have been very broadly characterised with not every hedgerow/treeline walked. Further surveys will be required to obtain more detail of the habitat types and presence of fauna.

5.11. Due to the time of year, not all plant species may have been visible. That said, it is unlikely to alter the habitat type assigned.

⁶ <https://magic.defra.gov.uk/MagicMap.aspx>

⁷ <https://data.jncc.gov.uk/data/9578d07b-e018-4c66-9c1b-47110f14df2a/Handbook-Phase1-HabitatSurvey-Revised-2016.pdf>



Ecological Features

- 5.12. The site comprises of two arable fields with margins of species-poor semi-improved grassland, tall ruderal, scattered scrub or improved grassland and another field to the east comprising tussocky, species-poor semi-improved grassland with dense scrub. The fields are bounded by native, species-poor hedgerows, tree lines (native and non-native) or fences, with varying management regimes and associated scrub patches. Mature trees are also present throughout the site, mainly associated with the hedgerows and the eastern and north-eastern grassland fields.
- 5.13. The desk study identified no internationally designated sites within 10km of the site boundary, however there are twelve Sites of Specific Scientific Interest (SSSI) within 2km, the nearest being the Restrop Farm and Brockhurst Wood SSSI which lies c. 2.46 km to the north of the site boundary. There are also several non-statutorily designated sites within 2km: one Local Nature Reserve (LNR), Jubilee Lake which lies directly adjacent to the eastern site boundary, and seven Local Wildlife Sites (LWS), the nearest being Flaxlands Manor LWS c. 0.96km north of the site.
- 5.14. Biological records purchased from the Wiltshire & Swindon Biological Record Centre (WSBRC) identified records for a variety of fauna, both onsite and within the wider area. Table 5.1 below outlines those records as well as the potential for each species onsite.

Species/Group	Records within 2km	Potential onsite
Amphibians	Records were returned for common toad <i>Bufo bufo</i> , the nearest being c.0.3 SW of the site boundary in 14/07/1999.	Potential onsite limited to hedgerow bases and tussocky grassland to the east. Three waterbodies within 500m, although one is Jubilee Lake which appears unsuitable.
Badger	WSBRC returned records of Eurasian badger <i>Meles meles</i> within the site (latrine) (22/02/2014)	Snuffle holes observed along the western boundary. Potential for foraging onsite within all three fields.
Bats	WSBRC returned records of noctule Bat <i>Nyctalus noctula</i> c.0.7km E of the site in 01/06/2015. Records were also returned for greater horseshoe bat <i>Rhinolophus ferrumequinum</i> , lesser horseshoe bat <i>Rhinolophus hipposideros</i> , serotine <i>Eptesicus serotinus</i> , Brandt's bat <i>Myotis brandti</i> , Daubenton's bat <i>Myotis daubentonii</i> , whiskered bat <i>Myotis mystacinus</i> , Natterer's bat <i>Myotis nattereri</i> , noctule <i>Nyctalus noctula</i> , pipistrelle species and brown long eared bat <i>Plecotus auritus</i> .	Several trees onsite with potential for roosting bats. Linear features onsite such as tree lines and hedgerows may act as commuting and foraging corridors.
Birds	WSBRC returned records of red-listed BoCC ⁸ including lapwing <i>Vanellus Vanellus</i> , European herring gull <i>Larus argentatus</i> , curlew <i>Numenius Arquata</i> , woodcock <i>Scolopax rusticola</i> , cuckoo <i>Cuculus canorus</i> , Eurasian skylark <i>Alauda arvensis</i> , yellowhammer <i>Emberiza citrinella</i> , lesser reppoll <i>Acanthis cabaret</i> , linnet <i>Linaria cannabina</i> , grasshopper warbler <i>Locustella naevia</i> , grey wagtail <i>Motacilla cinerea</i> , spotted flycatcher <i>Muscicapa striata</i> , marsh tit <i>Poecile palustris</i> , house sparrow <i>Passer domesticus</i> , starling <i>Sturnus vulgaris</i> , redwing <i>Turdus iliacus</i> , song thrush <i>Turdus philomelos</i> and fieldfare <i>Turdus pilaris</i> from the surrounding area. WSBRC returned records of amber-listed BoCC including common tern <i>Sterna hirundo</i> , green sandpiper <i>Tringa ochropus</i> , kingfisher <i>Alcedo atthis</i> , red kite <i>Milvus milvus</i> , western osprey <i>Pandion haliaetu</i> , peregrine <i>Falco peregrinus</i> and western barn owl <i>Tyto alba</i> within the surrounding area.	Potential for nesting birds within all hedgerows and trees onsite.
Brown hare	WSBRC returned records for brown hare <i>Lepus europaeus</i> c. 0.8km SE of site boundary in 06/04/2000.	Potential for brown hare within the arable fields.

⁸ Birds of Conservation Concern https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf



Dormouse	No records for dormouse <i>Muscardinus avellanarius</i> returned.	Potential onsite within all hedgerows and tree lines.
Hedgehog	WSBRC returned records for hedgehog <i>Erinaceus europaeus</i> c. 0.2km E of site boundary in 31/10/2019.	Potential onsite within all hedgerows and tree lines.
Invertebrates	WSBRC returned records of common darter <i>Sympetrum striolatum</i> recorded along the canal c.0.7km S in 29/07/2018.	Potential onsite.
Otter	WSBRC returned records of otter <i>Lutra lutra</i> c.0.7km N of site boundary in 12/12/2016.	No suitable habitat onsite.
Reptiles	WSBRC returned records of grass snake <i>Natrix helvetica</i> along the northern site boundary (Jubilee lake) in 21/09/2014.	Potential within the areas of grass to the east. Also hibernation potential in the hedgerow bases.
Water vole	WSBRC returned records of European water vole <i>Arvicola amphibius</i> in 30/09/1994 in Jubilee lake on the northern boundary of the site.	No suitable habitat onsite.
Plants	WSBRC returned records of keeled-fruited cornsalad <i>Valerianella carinata</i> c. 0.1km E of the site boundary in 03/08/2018.	Potential for notable species within the grassland field.

Table 5.1: Records returned from within 1km of the site boundary.

Opportunities and Constraints

5.15. Ecological opportunities and constraints are set out on **plan 13570/P10** and broadly described below.

5.16. The only important habitat features are the hedgerows and treelines. These should be incorporated into the multi-functional green infrastructure of the site, providing dark corridors to allow wildlife to continue to move through the site.

5.17. It is considered that the development could be designed to be in conformity with local and national planning policy and legislation by adopting the following principles:

- Hedgerows should be enhanced through infill planting with native, ecologically beneficial stock, improving opportunities a wide variety of species including birds and bats;
- Buffers along the hedgerows and tree lines will protect these important features and retain the linkages through the site for many species;
- A buffer along the eastern boundary will separate the development from the Jubilee Lake LNR. The eastern field, adjacent to the LNR, could be retained and enhanced, providing areas of public open space and access to nature as well as increasing nesting and foraging opportunities for a variety of fauna;
- Provision of bat and bird boxes on retained trees and integrated into new buildings will enhance nesting and roosting opportunities within the site;
- Provision of reptile hibernacula, hedgehog houses and insect hotels will encourage these species to utilise the site;
- A lighting strategy (which could be controlled by way of a condition on any future consent) to ensure new lighting is be designed sensitively to avoid impacts to light intolerant fauna (such as bats) and will allow the retention of dark corridors throughout the site; and



- Adopting Building with Nature⁹ design standards, the UK’s first green infrastructure benchmark providing “*a framework of quality standards, an assessment and accreditation service and national awards recognising the design and delivery of high-quality green infrastructure*”.

5.18. Provision of a Landscape and Ecological Management Plan (LEMP), which could be controlled by planning condition, will be fundamental to the delivery of habitat creation and enhancements to mitigate for the losses required and delivery of net gains for biodiversity.

5.19. To assist in the development of a masterplan and ultimately inform a planning application, early consultation with *inter alia*, the planning authority is recommended. The following detailed surveys may be required, although some requirements can be avoided if potential habitats are not being impacted:

- Badger,
- Bats (activity and roosting – trees and buildings);
- Dormouse;
- Great crested newt; and
- Reptiles.

Conclusion

5.20. In conclusion, no ecological issues that could affect the principle of development of the site have been identified. Those important ecological features that exist, or could exist, within the site could be accommodated by the adoption of appropriate design principles, and there are opportunities to deliver biodiversity net gain.

⁹ <https://www.buildingwithnature.org.uk/about>



Section 6: Landscape

Planning Policy

- 6.1. The site is not subject to any national or local landscape designations.
- 6.2. Within the Royal Wootton Bassett Neighbourhood Development Plan (NDP) (Made 2018), plan 5 identifies a 'Town Park' to the north and west of the site, with Jubilee Park to the north-east and existing footpath network (named the Row-de-Dow footpath) to the north, east and west. Policy 3 of the NDP relates to the Town Park and Row-de-Dow footpath and states that the provision of a park, improvement of public rights of way in this area and improvement of the Row-de-Dow footpath will be supported, subject to representing local character and safeguarding nature conservation interests. The provision of a Town Park is identified within the NDP as one of Royal Wootton Bassett's infrastructure requirements.
- 6.3. At a District level, the site lies within the Braydon Forest (NE12) saved policy of the North Wiltshire Local Plan 2011. Saved policy NE14 (trees and the control of new development) is also relevant. Policy NE12 states that the retention of the visual amenity and nature conservation value of the woodland within the Braydon Forest will be sought. The Braydon Forest is described within the 2011 Local Plan as a larger area covering a number of SSSI's which is run by the Wiltshire Wildlife Trust with the aim of conserving and enhancing the distinctive landscape of the old Braydon Forest comprising pasture and coppice woodland. Saved Policy NE14 states that permission will not be granted for proposals that would result, or be likely to result, in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features that could be successfully and appropriately incorporated into the design of a development. Essentially, development proposals are required to retain woodland, trees and hedgerows in accordance with these saved policies.
- 6.4. Also at a District level, the spatial strategy for Royal Wootton Bassett is identified within Core Policy 19 of the Adopted Wiltshire Core Strategy (WCS) (2015). Issues and considerations to be addressed in planning for the area include protection of the character and identity of the open countryside, conservation of the North Wessex Downs AONB and its setting (located near Broad Town to the south-east of Royal Wootton Bassett) and the maintenance and enhancement of the Great Western Community Forest (which the site lies within) as a significant infrastructure resource.
- 6.5. More general policy considerations relevant to landscape and/or visual matters include as follows:
 - NDP Policy 7: Design - Development must respect local character and conserve or enhance heritage assets in a manner appropriate to their significance.
 - NDP Policy 10: Landscape Setting - Development should safeguard the separate identity and locally distinctive character of Royal Wootton Bassett and its unique landscape setting.
 - WCS Core Policy 51: Landscape (supported by Topic Paper 5: Natural Environment) – Development should protect, conserve and where possible enhance landscape character. Proposals will need to demonstrate the following aspects of landscape character have been considered:
 - *"The locally distinctive pattern and species composition of natural features;*
 - *The locally distinctive character of settlements and their landscape settings;*



- *The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe;*
 - *Visually sensitive skylines, soils, geological and topographical features;*
 - *Landscape features of cultural, historic and heritage value;*
 - *Important views and visual amenity;*
 - *Tranquillity and the need to protect against intrusion from light pollution, noise and motion;*
 - *Landscape functions including places to live, work, relax and recreate;*
 - *Special qualities of AONBs.”*
- WCS Core Policy 52: Green Infrastructure (GI) (supported by Wiltshire’s GI Strategy and update) – Development shall make provision for the retention and enhancement of Wiltshire’s GI network. Where development is permitted, the following is required:
 - *“Retain and enhance existing on-site GI;*
 - *Make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards;*
 - *Put measures in place to ensure the long-term management of any GI;*
 - *Provide appropriate contributions towards the delivery of the Wiltshire GI Strategy;*
 - *Identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.”*
 - WCS Core Policy 57: Ensuring High Quality Design and Place Shaping – Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

Landscape Character

6.6. From a published perspective, the site lies within the following landscape character types/areas:

- National Character Area 108: Upper Thames Clay Vales;
- Wiltshire Landscape Character Assessment (2005) Landscape Type (LT) 8 – Limestone Ridge and Landscape Character Area (LCA) 8A – Swindon-Lyneham Limestone Ridge; and
- North Wiltshire Landscape Character Assessment (2004) Urban Fringe Landscape Character Type (LCT) and LCA 3 – Swindon Fringe.



6.7. The locations of these areas in relation the site are illustrated by **Plan 13750/P01**.

6.8. Whilst National Character is relevant as forming the background to the District level assessments, the characteristics and opportunities identified are too broad for the nature of this analysis.

6.9. Having reviewed the published documentation and undertaken a field visit in February 2021, the key landscape characteristics relevant to the site and its immediate environs are summarised as follows:

- *“Level hilltops contrast with steep slopes down to the surrounding clay lowland;*
- *Large fields with a network of hedgerow with numerous hedgerow trees;*
- *Scattered tree clumps and woodland blocks;*
- *Significant areas of housing and other development in the town of Royal Wootton Bassett;*
- *A mix of building ages and styles;*
- *Urban influences;*
- *Wide views from elevated positions; and*
- *A comprehensive network of public footpaths.”*

6.10. The key published management objectives that are considered to be relevant to the site and its immediate environs include as follows:

- *“Encourage repair, replanting and extension of the hedgerow network;*
- *Conserve existing trees and encourage the planting of new hedgerow trees and woodland belts, especially around larger settlements where they are being lost or could break up harsh urban edges;*
- *Consider where development related to principal settlements is most appropriate in terms of landscape and visual effects;*
- *Reduce the impact of urban influences on roads;*
- *Seek to limit the visual and acoustic intrusion of the main roads;*
- *Discourage change of land use except where visual impact from the public realm is minimised;*
- *Ensure development reinforces the locally distinctive character and respects the vernacular, and incorporates landscape mitigation to minimise adverse effects on the landscape and visual amenity; and*



- *Maintain and use footpath network to offer local people recreational opportunities in terms of countryside access routes and cycleways.”*

6.11. The key observations of the site from the field visit in relation to the local landscape are summarised as follows:

- The site adjoins the built edge of RWB and is influenced by this settlement edge character;
- Existing beneficial tree screening to the north east, north west, south west and south limits views and visibility; and
- The topography of the site is elevated and gently sloping.

Views and Visibility

6.12. For the purposes of informing this analysis, the identification of viewpoints has been determined from selected external spaces within the public domain. The locations are illustrated by **Plan 13750/P02** and the photographs are contained within photosheets, **Plan 13750/P03**. Photographs taken from six locations (in winter) were selected to provide a representation of local and wider views from within an initial computer-generated Zone of Theoretical Visibility (ZTV). The ZTV is generated based on landform data only and does not include features such as trees and built form which limit visibility within the landscape. Field verification is therefore essential and has been undertaken as part of this analysis.

6.13. The site is visually well contained for the most part by scattered trees and hedgerow features. Extensive wooded features to the west, far north and north east (near Jubilee Lake) enclose the site and limit views. A linear tree belt along the boundary with the RWB Academy effectively limits views from the south. There are localised views of the site from the south-east as there is limited boundary vegetation along the south eastern boundary. Whilst the site is located at an elevated position, collectively the presence of these vegetative features limits views to a localised extent.

6.14. The site occupies a settlement edge position adjoining the built edge of RWB to the east. There are no distant views of the site from the east due to the intervening built of RWB.

6.15. The Conservation Area, (situated near High Street) is not visible from the site due to the distance that it is located from the site, intervening built form and intervening vegetation.

6.16. The key observations of the site from the field visit in relation to views and the visual context are summarised as follows:

- The site is generally visually contained by trees and vegetation; except for the northern boundary which is not defined by any physical feature and the south eastern boundary which is undefined and in close proximity to existing residential built form;
- The northern boundary will require definition, for example appropriate landscape treatment to soften the built edge and filter views from the north of any proposed development;
- The site occupies a settlement edge location adjoining the built edge of RWB (Lucerne Close and Withy Close);
- A row of evergreen trees in the south western edge of the site is a key feature in the view and limits visibility;
- Visual receptors are located close to the site and are relatively small in number; and



- A landscape framework that would accompany a development at this site could provide a softening setting on the edge of RWB and provide linkages to the nearby footpath route and Jubilee Lake recreational attraction.

Opportunities and Constraints

6.17. As illustrated by **Plan 13750/P10**, the key landscape and visual recommendations for the site are summarised as follows:

- Opportunity to locate development close to the existing built edge;
- Opportunity to provide a soft edge to development along the northern and western edges and to RWB;
- Opportunity to provide new planting to connect with the existing green infrastructure network on site;
- Opportunity to extend the Public Right of Way (PRoW) within the site to link the edge of RWB to the wider PRoW network (including Jubilee Lake to the east, the Row-de-Dow footpath and Town Park); and
- The undefined northern boundary requires soft interface treatment.

Conclusion

6.18. Overall, there is potential for the site to accommodate development provided an appropriate landscape strategy is followed. There is an opportunity to set development parcels within a mature framework of vegetation, set back from the edge of the sloping topography, beyond the northern and western site boundaries. There are opportunities to incorporate and enhance landscape features and provide non-vehicular linkages to the nearby popular visitor attraction of Jubilee Lake and include linkages with the Town Park and Row-de-Dow footpath network identified within the NDP.



Section 7: Conclusions

- 7.1. Taking all disciplines into account, no environmental issues that could affect the principle or quantum of development of the site have been identified. Those valuable features that exist at the site can be accommodated by the adoption of relatively simple design principles. In addition, there is potential to enhance the site in line with the objectives set out in the local plan.



Appendix 1: BS5837 Cascade Chart for Tree Quality Assessment



Appendix 1: BS5837 Cascade Chart for Tree Quality Assessment

TREES FOR REMOVAL				
Category and Definition	Criteria			Identification on Plan
<p>Category U</p> <p>Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years</p>	<p>Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category U trees (i.e. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning).</p> <p>Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline.</p> <p>Trees infected with pathogens of significance to the health and/or safety of other trees nearby or very low-quality trees suppressing adjacent trees of better quality.</p> <p>(NOTE: Category U trees can have existing or potential conservation value which it might be desirable to preserve)</p>			DARK RED
TREES TO BE CONSIDERED FOR RETENTION				
Category and Definition	Criteria - Subcategories			Identification on Plan
	1. Mainly Arboricultural Values	2. Mainly Landscape Values	3. Mainly Cultural Values, including Conservation	
<p>Category A</p> <p>Trees of high quality with an estimated remaining life expectancy of at least 40 years</p>	<p>Trees that are particularly good examples of their species, especially if rare or unusual; or those that are essential components of groups or formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)</p>	<p>Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features</p>	<p>Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)</p>	LIGHT GREEN



TREES TO BE CONSIDERED FOR RETENTION

<p>Category B Trees of moderate quality with an estimated remaining life expectancy of at least 20 years</p>	<p>Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remedial defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation.</p>	<p>Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality</p>	<p>Trees with material conservation or other cultural benefits.</p>	<p>MID BLUE</p>
<p>Category C Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm</p>	<p>Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories.</p>	<p>Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value; and/or trees offering low or temporary/transient landscape benefit.</p>	<p>Trees with no material conservation or other cultural value.</p>	<p>GREY</p>



Plans:

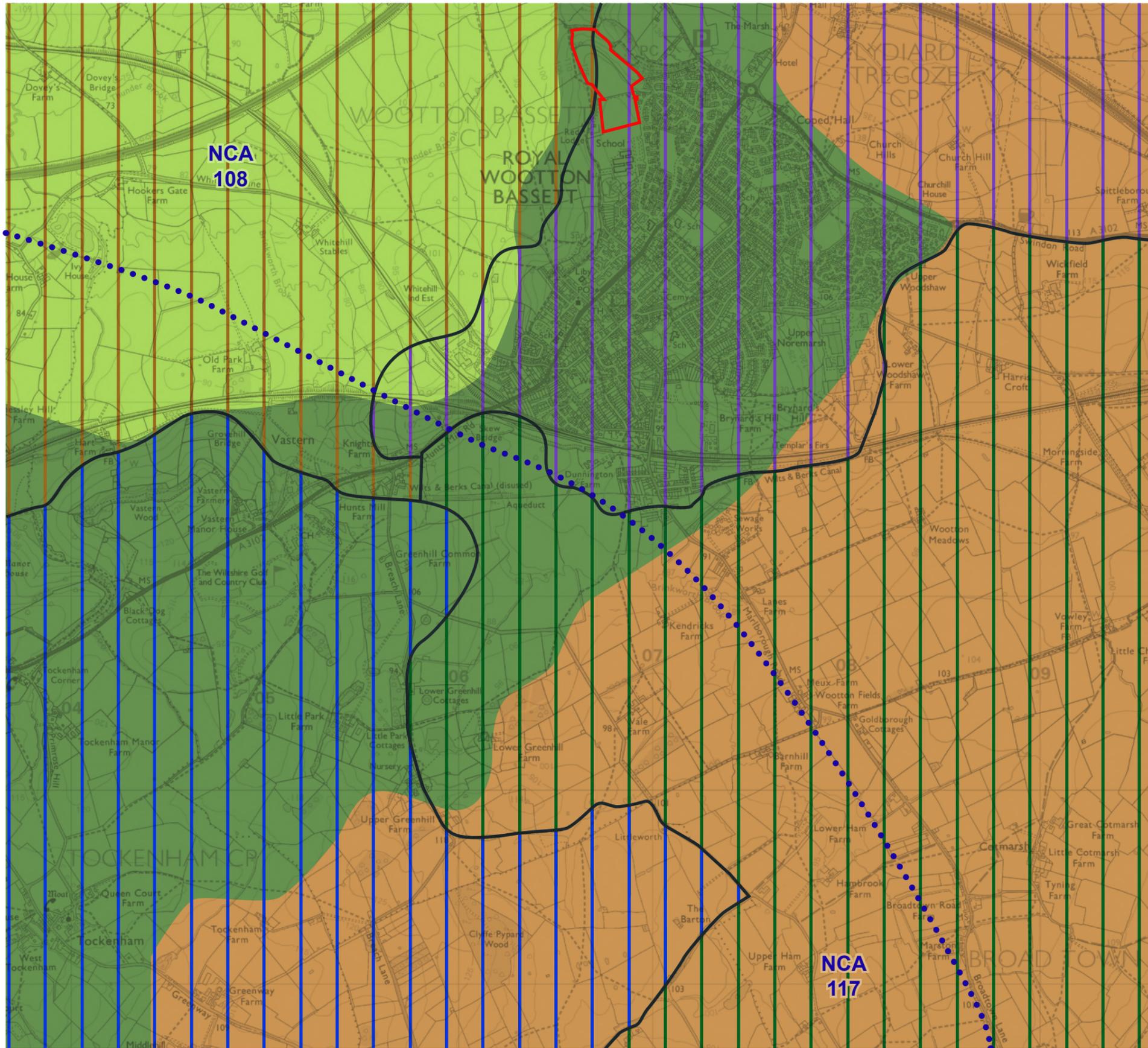
13750/P01: Landscape Character – National, County and District Context

13750/P02: Viewpoint Location Plan

13750/P03: Photosheets

13750/P10: Combined Opportunities and Constraints





 Site Boundary

National Character Areas

-  **NCA 108** Upper Thames Clay Vales
-  **NCA 117** Avon Vales

Wiltshire Landscape Character Assessment (2005)

-  LCT 8 Limestone Ridge (8A, Swindon - Lyneham Limestone Ridge)
-  LCT 11 Rolling Clay Lowland (11A, Calne Rolling Clay Lowland)
-  LCT 12 Open Clay Vale (12B, Avon Open Clay Vale)

North Wiltshire Landscape Character Assessment (2004)

-  LCT Urban Fringe Scarp (LCA 3, Swindon Fringe)
-  LCT Lowland Clay Farmland (LCA 14, Hillmarton Rolling Lowland)
-  LCT Settled Hill Farmland (LCA 13, Lyneham Hills)
-  LCT Lowland River Farmlands (LCA 11, Avon Valley Lowlands)

NOTE: Boundaries are based on maps within the Landscape Character Assessments and are indicative



Project Details	Land off Maple Drive, Royal Wootton Bassett
Title	Landscape Character - National, County and District Context
Scale	As shown (Approximate)
Drawing Ref	13750/P01
Date	March 2021
Checked	KP/AW



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-  Site Boundary
-  Viewpoints



Project Land off Maple Drive

Drawing Title **Viewpoint Location Plan**

Scale Not to Scale @ A3

Drawing No. 13750/P02

Date March 2021

Checked KP/AW



Marsden Estate, Rendcomb, Cirencester, GL7 7EX
 T: 0128 583 1804 E: landscape@tylergrange.co.uk W: www.tylergrange.co.uk



Photoviewpoint 1: Taken from the edge of Church street, south of site



Photoviewpoint 2: Taken from east of site boundary, off Lucerne Close



Photoviewpoint 3: Taken from B4042, Royal Wotton Bassett Rugby Football Club



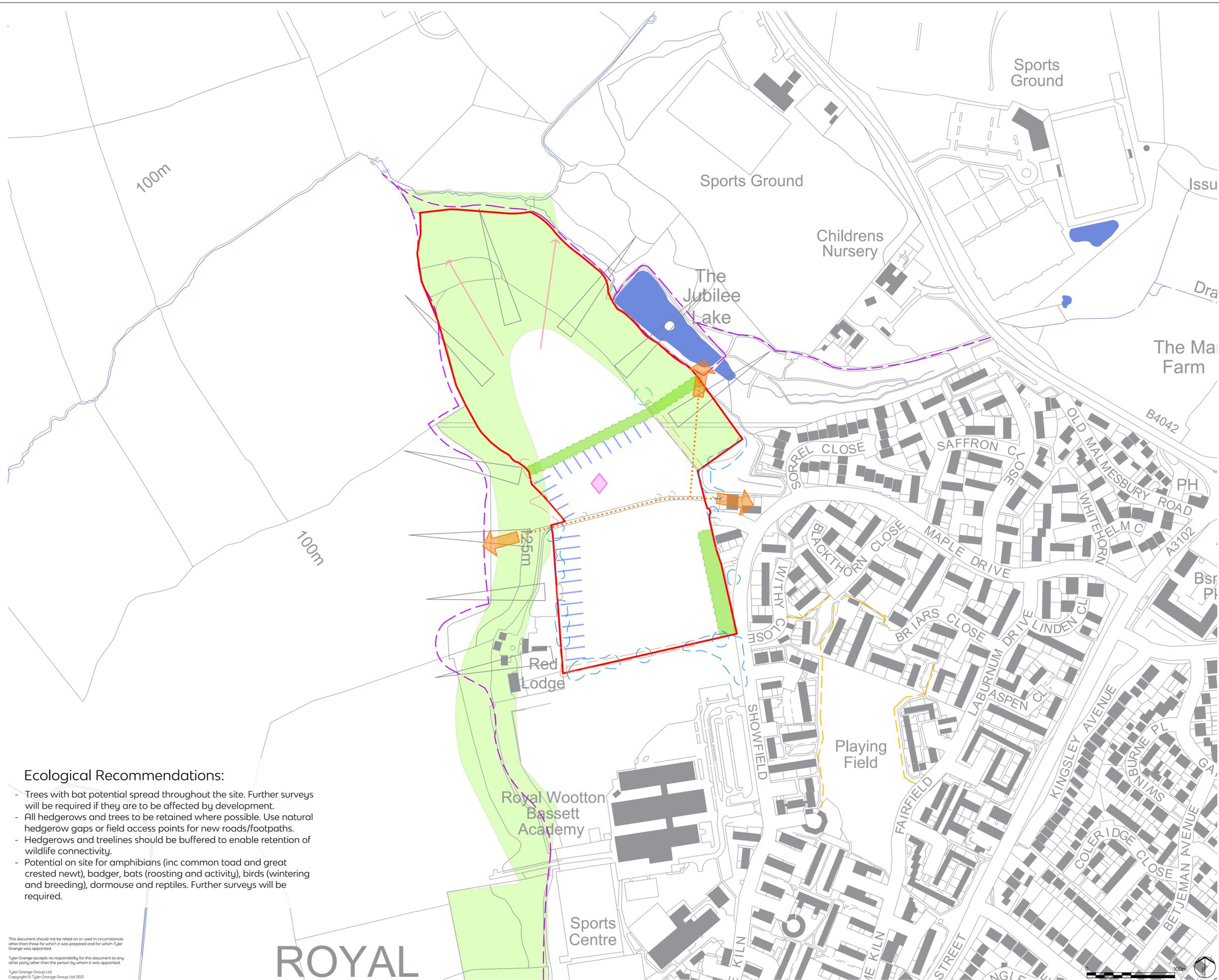
Photoviewpoint 4: Taken from Flaxlands Lane, facing south



Photoviewpoint 5: Taken from M4 north west of site



Photoviewpoint 6: Taken from Whitehill Lane, west of site



Key:

-  Site Boundary
-  Existing Public Right of Way to be Retained
-  NDP Row-de-Dow Footpath
-  Existing Sloping Topography
-  Existing Long Distance Views
-  NDP Town Park
-  Existing Category A Trees
-  Existing Category B Trees
-  Existing Category C Trees
-  Site of Archaeological Finds

Landscape and Visual Recommendations

-  Opportunity for new PROW route to enable connections with wider network, including the adjacent Jubilee Lake
-  Facilitate non-vehicular connections between the settlement and wider landscape
-  Opportunity for a new hedgerow / trees to enclose the site and provide Green Infrastructure connectivity
-  Opportunity to create a new 'strong edge' to Royal Wotton Bassett, at the interchange with the wider landscape

Ecological Recommendations:

- Trees with bat potential spread throughout the site. Further surveys will be required if they are to be affected by development.
- All hedgerows and trees to be retained where possible. Use natural hedgerow gaps or field access points for new roads/footpaths.
- Hedgerows and treelines should be buffered to enable retention of wildlife connectivity.
- Potential on site for amphibians (inc common toad and great crested newt), badger, bats (roosting and activity), birds (wintering and breeding), dormouse and reptiles. Further surveys will be required.

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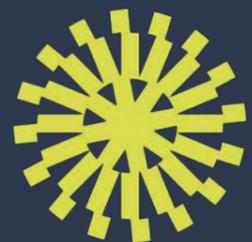
| Ecology

| Arboriculture

RWB56e

Strategic Overview of Environmental Issues

All projects
great
and small.



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Land North of Whitehill Lane, Royal
Wootton Bassett

9th March 2021

TG Report No. 13750_R02_LT_HM

Report No:	Date	Revision	Author	Checked
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Figure 1: Site boundary and surrounding area.



Section 2: Agriculture

Planning Policy

2.1 National planning policy guidance on development involving agricultural land is set out in National Planning Policy Framework (NPPF), which was revised on the 19th February 2019. The NPPF aims to provide a simplified planning framework which sets out the Government's economic, environmental and social planning policies for England. The NPPF includes policy guidance on 'Conserving and Enhancing the Natural Environment' (Section 15).

2.2 Paragraph 170 (a and b) (page 49) are of relevance to this assessment of agricultural land quality and soil and state that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;..."

2.3 Paragraph 171 of the NPPF (2019) goes on to describe that:

"Plan should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵³ ..."

2.4 Footnote number 53 states that:

"Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality."

Wiltshire Council Core Strategy

2.5 The Wiltshire Council Core Strategy (Adopted January 2015) includes Core Policy 51 'Landscape' which states (inter alia) '...proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures', including 'iv. Visually sensitive skylines, soils, geological and topographical features'.

2.6 There is no Core Policy for development involving the Best and Most Versatile (BMV) agricultural land. In this case, consideration should be given to relevant national policy (see above).



Survey Methodology

- 2.7 The work has been carried out by Robert Askew, who is a Chartered Scientist (CSci) and Fellow (F.I. Soil Sci) of the British Society of Soil Science (BSSS). The soil surveyor meets the requirements of the BSSS Professional Competency Standard (PCS) scheme for ALC (see BSSS PCS Document 2 'Agricultural Land Classification of England and Wales'¹. The BSSS PCS scheme is endorsed, amongst others, by the Department for Environment, Food and Rural Affairs (Defra), Natural England, the Science Council, and the Institute of Environmental Assessment and Management (IEMA).
- 2.8 This assessment is based upon the findings of a study of published information on climate, geology and soil. It follows the approach of the Ministry of Agriculture, Fisheries and Food (MAFF)² 'Agricultural Land Classification of England and Wales: Revised Guidelines and Criteria for Grading the Quality of Agricultural Land', October, 1988 (henceforth referred to as the 'the ALC Guidelines').
- 2.9 The ALC system provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. The ALC system divides agricultural land into five grades (Grade 1 'Excellent' to Grade 5 'Very Poor'), with Grade 3 subdivided into Subgrade 3a 'Good' and Subgrade 3b 'Moderate'. Agricultural land classified as Grade 1, 2 and Subgrade 3a falls in the 'best and most versatile' category in Paragraph 170 and 171 of the National Planning Policy Framework (NPPF) revised in February 2019. Further details of the ALC system and national planning policy implications are set out by Natural England in Technical Information Note 0493.
- 2.10 The Department for Environment, Food and Rural Affairs (Defra) has published 'Safeguarding our Soils – A Strategy for England' (24th September 2009). The Soil Strategy was published in tandem with a 'Code of Practice for the Sustainable Use of Soils on Construction Sites'⁴. The Soil Strategy for England, which builds on Defra's 'Soil Action Plan for England (2004-2006), sets out an ambitious vision to protect and improve soil to meet an increased global demand for food and to help combat the adverse effects of climate change.

Agricultural Features

- 2.11 The land off Whitehill Lane, on the south-western urban edge of the town, is underlain by mudstone in the Ampthill Clay Formation and Kimmeridge Clay Formation, which is covered by clay soils in the Denchworth Association. It is limited by soil wetness to Subgrade 3b, which is outside the national BMV category, as defined in paragraphs 171 and 172 of the NPPF (2019).

Opportunities and Constraints

- 2.12 With regard to mitigation for the for the loss of some agricultural land at the Site, and disturbing the soil thereon, current best practice on the sustainable use of soil on construction sites should be considered. Opportunities exist to strip and store soil resources (i.e., topsoil and subsoil) on Site for re-use in residential gardens, landscaping areas and open space. The sustainable use of soil as part of construction at the Site could be achieved through a suitably worded condition of planning permission, as recommended in Defra's Code of Practice (2009).

¹ British Society of Soil Science. Professional Competency Scheme Document 2 'Agricultural Land Classification of England and Wales'. Available online @ <https://www.soils.org.uk/sites/default/files/events/flyers/ipss-competency-doc2.pdf> Last accessed July 2020

² The Ministry of Agriculture, Fisheries and Food (MAFF) was incorporated within the Department for Environment, Food and Rural Affairs (Defra) in June 2001

³ Natural England (December, 2012). 'Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049)'. Available online @ <http://publications.naturalengland.org.uk/publication/35012> Last accessed March 2021

⁴ Department for Environment, Food and Rural Affairs (September, 2009) 'Code of Practice for the Sustainable Use of Soils on Construction Sites'. Available online @ <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>. Last accessed March 2021



Conclusions

- 2.13 Development of predominantly clayey, slowly permeable and seasonally waterlogged agricultural land over mudstone (i.e., Denchworth Association) across the site is unlikely to harm national agricultural interests in terms of paragraphs 171 and 172 of the NPPF (2019), and relevant Development Plan policy in the Wiltshire Core Strategy (2015).



Section 3: Arboriculture

Planning Policy

- 3.1. Under the Town and Country Planning Act 1990 (as amended) the requirement to consider trees as part of development is a material planning consideration and will be taken into account in the determination of planning applications.
- 3.2. At a national level, the consideration for trees is recognised in the context of their contribution to green infrastructure and biodiversity networks (Paragraph 170, 171 and 174 of the NPPF), and also in terms of their contribution in landscape terms to the local setting and character (Paragraph 170 of the NPPF). Great weight is also applied to the importance of conserving existing aged trees, including ancient woodland and trees and trees considered to be ‘veterans’ (Paragraph 175 of the NPPF). No ancient woodland was identified within influence of the site; however, a group of potential veteran trees were identified during the walkover and therefore para 175 is considered applicable to development on the site.
- 3.3. As part of the Wiltshire Core Strategy (adopted in 2015), Core Policy 50 (Biodiversity and Geodiversity) states that “development proposals must demonstrate how they protect features of nature conservation as part of the design rationale”. It goes further, stating that “where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable on circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measure can be secured to ensure no net loss of the local biodiversity resource, and secure integrity of local ecological networks and provision of ecosystem service”.
- 3.4. Core Policy 52 (Green Infrastructure (GI)) states that: “development proposals should make provision for the retention and enhancement of Wiltshire’s Green Infrastructure network. If damage or loss of existing Green Infrastructure is unavoidable, the creation of new or replacement Green Infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the Green Infrastructure network, will be required.”

Survey Methodology

- 3.5. The site walkover comprised an initial appraisal guided by BS5837:2012 to determine the quality and value of the trees present but did not constitute a fully detailed tree quality survey at this stage. Tree locations have been approximated using measurements during the tree survey and informed by aerial photography. The overall arrangement of tree cover, including tree grading value, is illustrated on the Combined Opportunities and Constraints Plan (TG Ref: 13750/P11)
- 3.6. The trees surveyed were visually inspected from ground level only and the value of trees has been assessed in accordance with the BS5837 Cascade Chart for Tree Quality Assessment (See **Appendix 1**).

Arboriculture Features

- 3.7. The walkover identified one group of trees of high value (Category A); two trees and five groups of trees of moderate value (Category B) and three groups of trees and two hedgerows of low value (Category C). The majority of this existing tree cover is located on the boundaries of the site and the boundaries of the field parcels.



- 3.8. The high value features include one group of trees considered to be 'veteran' in age class that are present in the north-eastern corner of the site, at the top of the hill. The group comprises four Horse Chestnut trees and one Beech, all of which are deemed to be considered 'veteran'. The group has a cohesive canopy and established in a ring formation with an average stem diameter of 1250mm and a height of 15 metres.
- 3.9. The moderate value features comprise a woodland along the western boundary of the site which is of mixed species (Ash, Elder, Elm, Sycamore). The woodland ranges from young to mature age class including some dead or dying species, primarily Elm. The other moderate value features are typically groups of collective merit with individuals of lesser value. Species include Ash, Crack Willow, Goat Willow, Blackthorn, Hazel, Field Maple, Elder and Hawthorn.
- 3.10. The low value features comprise the majority of the field boundary hedgerow network within and around the site. These hedgerows are defunct in parts, where sections of elm have succumbed to Dutch Elm Disease resulting in poor health and connectivity.
- 3.11. No trees onsite are subject to a Tree Preservation Order, Ancient Woodland or Conservation Area designation.

Opportunities and Constraints

- 3.12. The site's principal arboricultural features are established on the boundaries. One group of high value, veteran trees are established in the north-eastern corner of the site which presents key constraint to development in this area in line with paragraph 175 of the NPPF. The moderate value areas of woodland on the western boundary and scattered groups on the eastern boundary present also present notable features at the edge of the site that can be incorporated into the proposed Green Infrastructure network.
- 3.13. There is an opportunity to strengthen all boundary features to improve the landscape / Green Infrastructure framework of the site. Further design considerations include the siting of development to avoid Root Protection Areas of trees, and the potential impacts of tree shading across new development areas. Suitable development buffers, including rear gardens if possible, should be provided adjacent to this feature to avoid social pressures to remove or cut back the trees. The government standing advice relating to suitable semi-natural buffers from veteran trees will also need to be considered.

Future Work

- 3.14. Should the site be considered for a future planning application, the implementation of a full BS5837:2012 Tree Quality Survey is recommended. This should inform any detailed design scheme and demonstrate compliance with local planning policy.
- 3.15. A full BS5837:2012 Tree Quality Survey will need to be based on measured topographic survey data in order to obtain accurate locations of trees and the associated design constraints. This in turn would inform the definitive development offsets, boundary treatments and design implications with respect to arboriculture.

Conclusion

- 3.16. Our initial appraisal of the site finds that there are no major issues, as far as existing trees are concerned, that affect the principle of development on the site. The areas of mature tree cover, at the boundaries, including potential veteran trees, will need to be safeguarded which can be achieved through further survey and layout design work.



Section 4: Heritage

Planning Policy

- 4.1. The 1990 Planning (Listed Buildings and Conservation Areas) Act confirms that, in reaching planning decisions, the local planning authority should have special regard to preserving listed buildings and their settings, as well as the character and appearance within conservation areas.
- 4.2. The National Planning Policy Framework (NPPF, MHCLG 2019) defines ‘heritage assets’ as any aspect of the historic environment which is of such significance that it is a material consideration in planning decisions. It is noted that any harm or loss should require clear and convincing justification, with ‘substantial harm’ to or loss of designated heritage assets of the highest significance (Grade I and II*) ‘wholly exceptional’ and ‘exceptional’ for Grade II listed buildings and conservation areas (Paragraph 194).
- 4.3. Where ‘less than substantial harm’ to the significance of a designated heritage asset may be caused, the harm should be weighed against the public benefits of the proposal. Paragraph 197 notes that effects on the significance of non-designated heritage assets, including most archaeological remains, require a balanced judgement weighing the scale of impact on the significance of the heritage asset against the benefits of the proposed development. Where heritage assets are to be lost. Paragraph 199 confirms that an appropriate record of the elements to be lost should be provided for.
- 4.4. Policy C58 also states that distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets which contribute to a sense of local character and identity, will be conserved or enhanced. Policy 57 – Ensuring High Quality Design and Place Shaping, is cross-referenced as heritage assets can contribute to wider social, cultural, economic and environmental benefits.

Survey Methodology

- 4.5. For previous surveys undertaken for the western section of the site, Wiltshire Historic Environment Record (HER) and archives in Trowbridge were originally consulted as was the Historic England Archive in Swindon. These and online sources informed site walkovers. More recently, TG has been instructed to also consider land south east of RWB. Wiltshire Historic Environment Record (HER) and online sources informed a site walkover of the south eastern area and its environs in February 2021. New HER data was also secured for the area to the south west.

Heritage Baseline (Summary)

- 4.6. The existing hedgerows should be retained where possible as should a mound on the north east edge of the site which may have been the site of a post-medieval windmill (see **Plan 13750/P11**). The site of a nineteenth century farm building within the site has negligible significance and is the only HER record located within or close to the site area.
- 4.7. There is no indication of any particular archaeological potential within the site, and it may well have been part of Braydon Forest and subsequently Vastern Park in the medieval period. Settlement is likely to have been on higher ground to the east. Tree roots from an orchard mapped within the site and more recent ploughing are likely to have truncated any sub-surface archaeological remains which lie within the site.



Opportunities and Constraints

- 4.8. In accordance with current policy and practice, some further archaeological investigation is likely to be required ahead of planning permission being granted. Fieldwork might include geophysical survey and trial trenching. This would confirm if the site contains any significant sub-surface remains. Any such remains could consequently be investigated in advance of construction to ensure compliance with policy.
- 4.9. Future development will need to be sensitive to the nearby town centre conservation area. Views from Whitehill Lane through to the parish church spire could be provided as part of the detailed layout. Open space on the higher western ground would minimise any adverse effect on views from the south western edge of the conservation area. However, most of the site is shielded from the conservation area by topography and vegetation.
- 4.10. Listed buildings within the conservation area, including the Grade II* listed Church of St Bartholomew and All Saints, are all surrounded by later development and their heritage significance would not be affected by change within the site.

Conclusion

- 4.11. In conclusion, no heritage issues that would affect the principle or quantum of development have been identified. There is every reason to expect that allocation and future development of the site could accord with relevant planning policy and legislation that seeks to protect and enhance heritage resources and their settings.



Section 5: Ecology

Planning Policy

5.1. Section 15 of the NPPF (paragraphs 170 to 177) considers the conservation and enhancement of the natural environment. In summary, planning and decisions should:

- Contribute to and enhance the natural and local environment;
- distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries; and
- Protect and enhance biodiversity and geodiversity.

5.2. Core Policy 50 (Biodiversity and Geology) of the Wiltshire Core Strategy⁵ (adopted in 2015) describes how developments must “*demonstrate how they protect features of conservation and geological value as part of the design rationale*”. It goes further, stating “*an expectation that such features be retained, buffered and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term*”. In addition, there is a requirement to provide biodiversity enhancement, particularly within larger developments, which will contribute to the conservation objectives and targets of the Biodiversity Action plan (BAP) and/or the relevant River Basin/Catchment Management Plan.

5.3. Core Policy 52 (Green Infrastructure (GI)) states, amongst others, a requirement for the retention and enhancement of existing onsite GI, appropriate measures to ensure long-term management of GI related to the development, appropriate contribution towards the delivery of the Wiltshire Green Infrastructure Strategy⁶ and provision of opportunities to enhance natural linkages throughout Wiltshire.

5.4. Core Policy 53 (Wiltshire’s Canals) requires that the canal line is protected with a view to the long-term re-establishment as a navigable waterway. It states that “*proposals will be permitted that are designed to develop the canal’s recreational and nature conservation potential, in particular, the use of the old line of the canal for walking, cycling and interpretation*”.

5.5. Item ii of Core Policy 57 (Ensuring high quality design and place shaping) states “*the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development*”.

⁵ <https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wcs.pdf?m=637099399373530000>

⁶ https://cms.wiltshire.gov.uk/documents/s156001/GI_slides.pdf



Survey Methodology

5.6. A desk-based study was conducted whereby records of designated sites and records of protected and priority species were purchased and interrogated for the site and its environs. The following resources were consulted / contacted:

- Multi-Agency Geographic Information for the countryside (MAGIC) website⁷;
- Wiltshire & Swindon Biological Record Centre (WSBRC);
- Joint Nature Conservation Committee (JNCC) website;
- Natural England (NE) designated sites website;
- Ordnance Survey mapping; and
- Google Maps, including aerial photography and Google StreetView.

5.7. The following areas of search around the red line boundary of the site (red line shown on **Plan 13750/P11**) were applied:

- 1km for protected and priority species;
- 2km for non-statutorily designated sites;
- 5km for statutorily designated sites (excluding European sites); and
- 10km for European statutory sites.

5.8. A site visit was undertaken on 22nd February 2021. An 'extended' Phase I habitat survey where habitats and dominant plant species were identified and mapped was undertaken. The methods used during the walkover surveys broadly followed methods outlined in the JNCC Phase I habitat survey handbook⁸. This technique provides an inventory of the habitat types present and dominant species.

5.9. During the site visit, any evidence or potential for protected/priority fauna was also identified, including any evidence of badger and assessing tree for bat roosting potential. A Habitat Suitability Index (HSI) assessment of all ponds onsite and adjacent to the boundaries (where possible) was also undertaken.

5.10. The weather conditions during the survey were mostly dry with light rain at the beginning of the day, with a calm wind and a temperature of 7°C.

⁷ <https://magic.defra.gov.uk/MagicMap.aspx>

⁸ <https://data.jncc.gov.uk/data/9578d07b-e018-4c66-9c1b-47110f14df2a/Handbook-Phase1-HabitatSurvey-Revised-2016.pdf>



Limitations

- 5.11. The survey undertaken was a high-level survey. As such, the habitats have been very broadly characterised. Further surveys will be required to obtain more detail of the habitat types and presence of fauna.
- 5.12. Due to the time of year, not all plant species may have been visible. That said, it is unlikely to alter the habitat type assigned.

Ecological Features

- 5.13. Following the Phase I habitat survey, the site was found to comprise mostly arable fields. Other habitats on site are a woodland copse, a flowing ditch, tall ruderal, scrub and species-poor semi-improved grassland (in the field margins and along the ditch). All fields are bounded to some extent by native species-poor hedgerows or tree lines, all with varying management regimes and many with associated scrub patches. Mature trees are also present throughout the site.
- 5.14. The desk study identified no internationally designated sites within 10km of the site boundary, however there are twelve Sites of Specific Scientific Interest (SSSI) within 2km, the nearest being the Goldborough Farm Meadows SSSI which lies c. 3.0 km to the south-east of the site boundary. There are also several non-statutorily designated sites within 2km: one Local Nature Reserve (LNR), Jubilee Lake which lies c. 1.15km to the north, and four Local Wildlife Sites (LWS), the nearest being Hooker's Gate Farm Meadow LWS and the Folly Wood LWS, both of which lie c. 1.6km from the site, west and north-west, respectively.
- 5.15. Biological records purchased from the Wiltshire & Swindon Biological Record Centre (WSBRC) identified records for a variety of fauna, both on site and within the wider area. Table 5.1 below outlines those records as well as the potential for each species on site.

Species/Group	Records within 2km	Potential on site
Amphibians	Records were returned for common toad <i>Bufo bufo</i> , the nearest being c.0.2 NW of the site boundary in 14/07/1999.	Potential onsite limited to hedgerow bases, field margins and scrubby areas along the ditch. Three ponds within 500m of the site boundary.
Badger	WSBRC returned records of Eurasian badger <i>Meles meles</i> c. 0.2km S of the site boundary in 02/03/2008.	Potential for foraging on site within the field margins and along the ditch.
Bats	WSBRC returned records of a bat species c. 0.1km S of the site boundary in 08/02/1994. Records were also returned for greater horseshoe bat <i>Rhinolophus ferrumequinum</i> , lesser horseshoe bat <i>Rhinolophus hipposideros</i> , serotine <i>Eptesicus serotinus</i> , Brandt's bat <i>Myotis brandti</i> , Daubenton's bat <i>Myotis daubentonii</i> , whiskered bat <i>Myotis mystacinus</i> , Natterer's bat <i>Myotis nattereri</i> , noctule <i>Nyctalus noctula</i> , pipistrelle species and brown long eared bat <i>Plecotus auritus</i> .	Trees throughout the site with potential for roosting bats. Linear features on site such as tree lines, hedgerows and ditch may act as commuting and foraging corridors.
Birds	WSBRC returned records of red-listed BoCC ⁹ including lapwing <i>Vanellus Vanellus</i> , European herring gull <i>Larus argentatus</i> , curlew <i>Numenius Arquata</i> , woodcock <i>Scolopax rusticola</i> , cuckoo <i>Cuculus canorus</i> , Eurasian skylark <i>Alauda arvensis</i> , yellowhammer <i>Emberiza citrinella</i> , lesser reppoll <i>Acanthis cabaret</i> , linnet <i>Linaria cannabina</i> , grasshopper warbler <i>Locustella naevia</i> , grey wagtail <i>Motacilla cinerea</i> , spotted flycatcher <i>Muscicapa striata</i> , marsh tit <i>Poecile palustris</i> ,	Potential for nesting birds within all hedgerows and trees on site. Also potential for breeding and wintering birds within the grassland and arable fields.

⁹ Birds of Conservation Concern https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf



	house sparrow <i>Passer domesticus</i> , starling <i>Sturnus vulgaris</i> , redwing <i>Turdus iliacus</i> , song thrush <i>Turdus philomelos</i> and fieldfare <i>Turdus pilaris</i> from the surrounding area. WSBRC returned records of amber-listed BoCC including common tern <i>Sterna hirundo</i> , green sandpiper <i>Tringa ochropus</i> , kingfisher <i>Alcedo atthis</i> , red kite <i>Milvus milvus</i> , western osprey <i>Pandion haliaetu</i> , peregrine <i>Falco peregrinus</i> and western barn owl <i>Tyto alba</i> within the surrounding area.	
Brown hare	WSBRC returned records for brown hare <i>Lepus europaeus</i> c. 1km E of site boundary in 06/04/2000.	Potential for brown hare in the arable fields.
Dormouse	No records for dormouse <i>Muscardinus avellanarius</i> returned.	Potential onsite within all hedgerows and tree lines.
Hedgehog	WSBRC returned records for hedgehog <i>Erinaceus</i> c. 0.4km NE of site boundary in 31/10/2019.	Potential onsite within all hedgerows and tree lines.
Invertebrates	WSBRC returned records of common darter <i>Sympetrum striolatum</i> recorded along the canal c.0.5km S in 29/07/2018.	Potential on site, particularly along the ditch.
Otter	WSBRC returned records of otter <i>Lutra lutra</i> c.1.km N of site boundary in 12/12/2016	No suitable habitat on site.
Reptiles	WSBRC returned records of slow worm <i>Anguis fragilis</i> c.o. 1km E in allotments next to site boundary in 16/06/2009.	Potential within the tall ruderal, field margins and along the ditch. Also hibernation potential in the hedgerow bases.
Water vole	WSBRC returned records of water vole <i>Arvicola amphibius</i> c. 0.4km SE of the site boundary in 07/10/2017.	No suitable habitat on site.
Plants	WSBRC returned records of Field cow wheat <i>Melampyrum arvense</i> c. 0.15km SE in 05/07/2019.	Potential for notable species within the tall ruderal and grassland field margins.

Table 5.1: Records returned from within 1km of the site boundary.

Opportunities and Constraints

5.16. Ecological opportunities and constraints are set out on **plan 13570/P11** and broadly described below.

5.17. The only important habitat features comprise hedgerows, treelines and the flowing ditch. These should be incorporated into the multi-functional green/blue infrastructure of the site, providing dark corridors to allow wildlife to continue to move through the site and sustainable drainage systems with associated wetland planting to encourage new invertebrate species.

5.18. It is considered that the development could be designed to be in conformity with local and national planning policy and legislation by adopting the following principles:

- Hedgerows should be enhanced through infill planting with native, ecologically beneficial stock, improving opportunities a wide variety of species including birds and bats.
- Transitional buffers along the hedgerows and tree lines will protect these important features and improve the linkages through the site for many species.
- The ditch should be enhanced into a wildlife area, with wetland habitats to encourage new species to colonise.
- Provision of bat and bird boxes on retained trees and integrated into new buildings will enhance nesting and roosting opportunities within the site;
- Provision of reptile hibernacula, hedgehog houses and insect hotels will encourage these species to utilise the site;



- An appropriate lighting strategy (which could be controlled by way of a condition on any future consent) would ensure new lighting is be designed sensitively to avoid impacts to light0intolerant bat species and will allow the retention of dark corridors throughout the site; and
- Building with Nature¹⁰, the UK’s first green infrastructure benchmark providing “a framework of quality standards, an assessment and accreditation service and national awards recognising the design and delivery of high-quality green infrastructure”, could be considered for this site.

5.19. Provision of a Landscape and Ecological Management Plan (LEMP), which could be controlled by planning condition, will be fundamental to the delivery of habitat creation and enhancements to mitigate for the losses required and delivery net gains for biodiversity;

5.20. To assist in the development of a masterplan and ultimately inform a planning application, early consultation with *inter alia*, the planning authority is recommended. The following detailed surveys may be required, although some requirements can be avoided if potential habitats are not being impacted:

- Badger;
- Bats (activity and roosting – trees and buildings);
- Birds (breeding and wintering);
- Dormouse;
- Great crested newt; and
- Reptiles.

Conclusion

5.21. In conclusion, no ecological issues that could affect the principle of development of the site have been identified. Those valuable ecological resources that exist, or could exist, within the site could be accommodated by the adoption of appropriate design principles.

¹⁰ <https://www.buildingwithnature.org.uk/about>



Section 6: Landscape

Planning Policy

- 6.1. The site is not subject to any national or local landscape designations.
- 6.2. Within the Royal Wootton Bassett Neighbourhood Development Plan (NDP) (Made 2018), plan 5 identifies a 'Town Park' within the northern edge of the site, and the existing footpath network (named the Row-de-Dow footpath) to the east. Policy 3 of the NDP relates to the Town Park and Row-de-Dow footpath and states that the provision of a park, improvement of public rights of way in this area and improvement of the Row-de-Dow footpath will be supported, subject to representing local character and safeguarding nature conservation interests. The provision of a Town Park is identified within the NDP as one of Royal Wootton Bassett's infrastructure requirements.
- 6.3. At a District level, the site lies within the Braydon Forest (NE12) saved policy of the North Wiltshire Local Plan 2011. Saved policy NE14 (trees and the control of new development) is also relevant. Policy NE12 states that the retention of the visual amenity and nature conservation value of the woodland within the Braydon Forest will be sought. The Braydon Forest is described within the 2011 Local Plan as a larger area covering a number of SSSI's which is run by the Wiltshire Wildlife Trust with the aim of conserving and enhancing the distinctive landscape of the old Braydon Forest comprising pasture and coppice woodland. Saved Policy NE14 states that permission will not be granted for proposals that would result, or be likely to result, in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features that could be successfully and appropriately incorporated into the design of a development. Essentially, development proposals are required to retain woodland, trees and hedges in accordance with these saved policies.
- 6.4. Also at a District level, the spatial strategy for Royal Wootton Bassett is identified within Core Policy 19 of the Adopted Wiltshire Core Strategy (WCS) (2015). Issues and considerations to be addressed in planning for the area include protection of the character and identity of the open countryside, conservation of the North Wessex Downs AONB and its setting (located near Broad Town to the south-east of Royal Wootton Bassett) and the maintenance and enhancement of the Great Western Community Forest (which the site lies within) as a significant infrastructure resource.
- 6.5. More general policy considerations relevant to landscape and/or visual matters include as follows:
 - NDP Policy 7: Design - Development must respect local character and conserve or enhance heritage assets in a manner appropriate to their significance.
 - NDP Policy 10: Landscape Setting - Development should safeguard the separate identity and locally distinctive character of Royal Wootton Bassett and its unique landscape setting.
 - WCS Core Policy 51: Landscape (supported by Topic Paper 5: Natural Environment) – Development should protect, conserve and where possible enhance landscape character. Proposals will need to demonstrate the following aspects of landscape character have been considered:
 - *"The locally distinctive pattern and species composition of natural features;*
 - *The locally distinctive character of settlements and their landscape settings;*



- *The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe;*
 - *Visually sensitive skylines, soils, geological and topographical features;*
 - *Landscape features of cultural, historic and heritage value;*
 - *Important views and visual amenity;*
 - *Tranquillity and the need to protect against intrusion from light pollution, noise and motion;*
 - *Landscape functions including places to live, work, relax and recreate;*
 - *Special qualities of AONBs.”*
- WCS Core Policy 52: Green Infrastructure (GI) (supported by Wiltshire’s GI Strategy and update) – Development shall make provision for the retention and enhancement of Wiltshire’s GI network. Where development is permitted, the following is required:
 - *“Retain and enhance existing on-site GI;*
 - *Make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards;*
 - *Put measures in place to ensure the long-term management of any GI;*
 - *Provide appropriate contributions towards the delivery of the Wiltshire GI Strategy;*
 - *Identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.”*
 - WCS Core Policy 57: Ensuring High Quality Design and Place Shaping – Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

Landscape Character

6.6. From a published perspective, the site lies within the following landscape character types/areas:

- National Character Area 108: Upper Thames Clay Vales;
- Wiltshire Landscape Character Assessment (2005)
 - Landscape Type (LT) 8 – Limestone Ridge and Landscape Character Area (LCA) 8A – Swindon-Lyneham Limestone Ridge ; and



- LT 12 – Open Clay Vale and LCA 12B – Avon Open Clay Vale.
- North Wiltshire Landscape Character Assessment (2004)
 - Urban Fringe Scarp Landscape Character Type (LCT) and LCA 3 – Swindon Fringe; and
 - Lowland River Farmland LCT and LCA 11 - Avon Valley Lowland.

6.7. The locations of these areas in relation the site are illustrated by plan reference 13750/P04.

6.8. Whilst National Character is relevant as forming the background to the District level assessments, the characteristics and opportunities identified are too broad for the nature of this analysis.

6.9. Having reviewed the published documentation and undertaken a field visit in February 2021, the following is noted in respect to landscape character:

6.10. The site contains characteristics which are more representative of the Limestone Ridge LT rather than the Open Clay Vale LT within the Wiltshire Landscape Character Assessment. The site also contains characteristics which are more representative of the Swindon Fringe LCA rather than the Avon Valley Lowland LCA within the North Wiltshire Landscape Character Assessment. The conclusions will therefore focus on the Limestone Ridge and Swindon Fringe character.

6.11. The key landscape characteristics relevant to the site and its immediate environs are summarised as follows:

- *“Steep slopes down to the surrounding clay lowland;*
- *Scattered tree clumps and woodland blocks;*
- *A variety of building styles from distinctive stone buildings in historic village centres to modern development using a mix of materials;*
- *Urban influences;*
- *Significant areas of housing and other development in the town of Wootton Bassett;*
- *Wide views from elevated positions;*
- *Presence of power lines;*
- *A comprehensive network of public footpaths.”*

6.12. The key published management objectives that are considered to be relevant to the site and its immediate environs include as follows:

- *“Encourage repair, replanting and extension of the hedgerow network;*



- *Conserve existing trees and encourage the planting of new hedgerow trees and woodland belts, especially around larger settlements where they are being lost or could break up harsh urban edges;*
- *Limit further uncontrolled spreading of settlement and ribbon development concentrating new development within existing settlements;*
- *Reduce the impact of urban influences on roads;*
- *Seek to limit the visual and acoustic intrusion of the main roads through measures such as tree planting;*
- *Discourage change of land use except where visual impact from the public realm is minimised;*
- *Consider where development related to principal settlements is most appropriate in terms of landscape and visual effects;*
- *Ensure development reinforces the locally distinctive character, respects the vernacular, and incorporates landscape mitigation to minimise adverse effects on the landscape and visual amenity;*
- *Identify and seek opportunities to create new woodland belts and copses, in particular to help screen and contain settlement;*
- *Maintain and use the footpath network to offer local people recreational opportunities in terms of countryside access routes and cycleways.”*

6.13. The key observations of the site from the field visit in relation to the local landscape are summarised as follows:

- The southern part of the site is situated within a settlement edge context, in close proximity to houses within Miltons Way, Salt Spring Drive, off Whitehill Lane and Industrial scale buildings within Whitehill Industrial Estate. Residential and Industrial use immediately abuts the site boundary.
- Due to the lack of physical enclosure on some site boundaries, the site reads within the context of the wider rural landscape. The northern field slopes in a west to east direction. The southern field slopes more gently in a west to east direction, and the part of the western field is low lying with a flatter topography.
- Immediately to the north east lies allotments and private gardens providing a buffer between the built edge and Conservation Area of Royal Wootton Bassett.

Views and Visibility

6.14. For the purposes of informing this analysis, the identification of viewpoints has been determined from selected external spaces within the public domain. The locations are illustrated by **Plan 13750/P05** and the photographs are contained within photosheets, **Plan 13750/P06**. Photographs taken from six locations (in winter) were selected to provide a representation of local and wider views from within an initial computer-generated Zone of Theoretical Visibility (ZTV). The ZTV is generated based on landform data only and does not include features such as trees and built form which limit visibility within the landscape. Field verification is therefore essential and has been undertaken as part of this analysis.



6.15. The site is generally visually exposed, with a dense hedgerow tree belt located along the western and central portion of the site, which occasionally filters views of the wider landscape beyond. The site has no physical boundary to the north which allows for uninterrupted views into the northern and north western fields. Due to the sloping nature of the northern field, the southern field is screened from view in panoramas from the north. Residential buildings, allotments and vegetation screen views of the site from the east. Localised views of the site from the south are mostly uninterrupted due to the lack of boundary vegetation along Whitehill Lane. Wider views of the site from the south are filtered by vegetation and are obstructed by built form located off Whitehill Lane. There are views of the site from the west, occasionally filtered through the hedgerow tree belt that is located along the western and central portion of the site.

6.16. Some buildings along Church Street have views to and are visible from the site. This is the only location from within the Conservation Area where the site is visible. Church Street is situated at an elevated position which overlooks the site; however intervening trees and vegetation filters views between the two.

6.17. The key observations of the site from the field visit in relation to views and the visual context are summarised as follows:

- The site is not well visually contained as the southern, northern and north western boundaries are undefined, which allows for uninterrupted close views. The southern field is more contained due to a gappy tree belt that runs through the centre of the site and the nature of the topography where the southern fields occupy lower lying ground;
- The northern and north western boundaries will require landscape treatment (i.e. tree planting) to establish a boundary, soften the built edge, filter views of development and soften the transition from a settlement to rural landscape character;
- A hedgerow tree belt located along the western and central portion of the site is a strong landscape feature that filters views of the site from the west;
- The southern and south eastern areas of the site occupy a settlement edge position within close proximity to the built edge of RWB (Milton's Way, Whitehill Lane and Salt Spring Drive);
- St Bartholomew and All Saints Church tower is a key feature in wider views and assists in identifying the location of the site;
- Buildings along Church Street, within the Conservation Area, overlook the site due to their position on higher ground but are separated by the vegetated allotments;
- Due to the sloping nature of the site and the lack of planting along the northern and north western boundaries, the site is visible in long distance views. This affects the number of people likely to see the site, however it lies within a view in which built form is already present. The site forms a small part within views;
- The units within Whitehill Industrial Estate are situated at a lower level to the surrounding landscape. Due to their large mass, they are still visible in views from the wider landscape;
- There is a Public Right of Way (PRoW) that traverses the most northern extent of the site and this links with a wider PRoW network. There are also a number of PRoW which have glimpsed views of the site; and
- A landscape framework that would accompany a development at this site could provide a softening setting on the edge of RWB and provide a portion of and linkages with a new Town Park and link with the Row-de-Dow footpath network.



Opportunities and Constraints

6.18. As illustrated by **Plan 13750/P11**, the key landscape and visual recommendations for the site are summarised as follows:

- Opportunity to locate development close to the existing built edge of RWB;
- Opportunity to provide a soft edge to development along the northern and north western edges;
- Opportunity to provide new planting to connect with the existing green infrastructure network;
- Opportunity to provide new tree planting along the southern site boundary that abuts Whitehill Lane. The provision of new tree planting in areas of the site closest to the Whitehill Industrial Estate will assist in filtering views of the units;
- Due to the exposed nature of the northern part of the site and its relationship within the wider rural landscape, the retention of open green spaces could be realised by the siting of the Town Park and other undeveloped spaces (play provision, allotments) in this more sensitive area.
- This could also incorporate improvements to the PRow network, connecting with the Row-de-Dow footpath route and a more naturalistic landscape to reflect its position;
- Views to and from the Conservation Area should be treated sensitively. The provision of new tree planting will assist in filtering views of the development from the Conservation Area; and
- The provision of new tree planting within development will maintain the existing well treed character of RWB where trees punctuate built form.

Conclusion

6.19. Overall, there is potential for the site to accommodate development provided an appropriate landscape strategy is followed. There is an opportunity to locate development parcels close to the existing settlement edge, with an offset provided at the interface with the wider undeveloped landscape and from the higher, more steeply sloping land in the north. This also provides the opportunity to include a portion of the 'Town Park' identified within the NDP and connect with the Row-de-Dow footpath network. The presence of existing vegetation and Thunder Brook provides the opportunity for development parcels to be set within a GI network which incorporates non-vehicular connectivity, riparian features and new vegetation. This would allow the parcels to be set within multi-functional GI which also 'breaks up' and filters views of the new built form.



Section 7: Conclusions

- 7.1. Taking all disciplines into account, no environmental issues that could affect the principle or quantum of development of the site have been identified. Those valuable features that exist at the site can be accommodated by the adoption of relatively simple design principles. In addition, there is potential to enhance the site in line with the objectives set out in the local plan.



Appendix 1: BS5837 Cascade Chart for Tree Quality Assessment



Appendix 1: BS5837 Cascade Chart for Tree Quality Assessment

TREES FOR REMOVAL				
Category and Definition	Criteria			Identification on Plan
<p>Category U</p> <p>Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years</p>	<p>Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category U trees (i.e. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning).</p> <p>Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline.</p> <p>Trees infected with pathogens of significance to the health and/or safety of other trees nearby or very low-quality trees suppressing adjacent trees of better quality.</p> <p>(NOTE: Category U trees can have existing or potential conservation value which it might be desirable to preserve)</p>			DARK RED
TREES TO BE CONSIDERED FOR RETENTION				
Category and Definition	Criteria - Subcategories			Identification on Plan
	1. Mainly Arboricultural Values	2. Mainly Landscape Values	3. Mainly Cultural Values, including Conservation	
<p>Category A</p> <p>Trees of high quality with an estimated remaining life expectancy of at least 40 years</p>	<p>Trees that are particularly good examples of their species, especially if rare or unusual; or those that are essential components of groups or formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)</p>	<p>Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features</p>	<p>Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)</p>	LIGHT GREEN



TREES TO BE CONSIDERED FOR RETENTION

<p>Category B Trees of moderate quality with an estimated remaining life expectancy of at least 20 years</p>	<p>Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remedial defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation.</p>	<p>Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality</p>	<p>Trees with material conservation or other cultural benefits.</p>	<p>MID BLUE</p>
<p>Category C Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm</p>	<p>Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories.</p>	<p>Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value; and/or trees offering low or temporary/transient landscape benefit.</p>	<p>Trees with no material conservation or other cultural value.</p>	<p>GREY</p>



Plans:

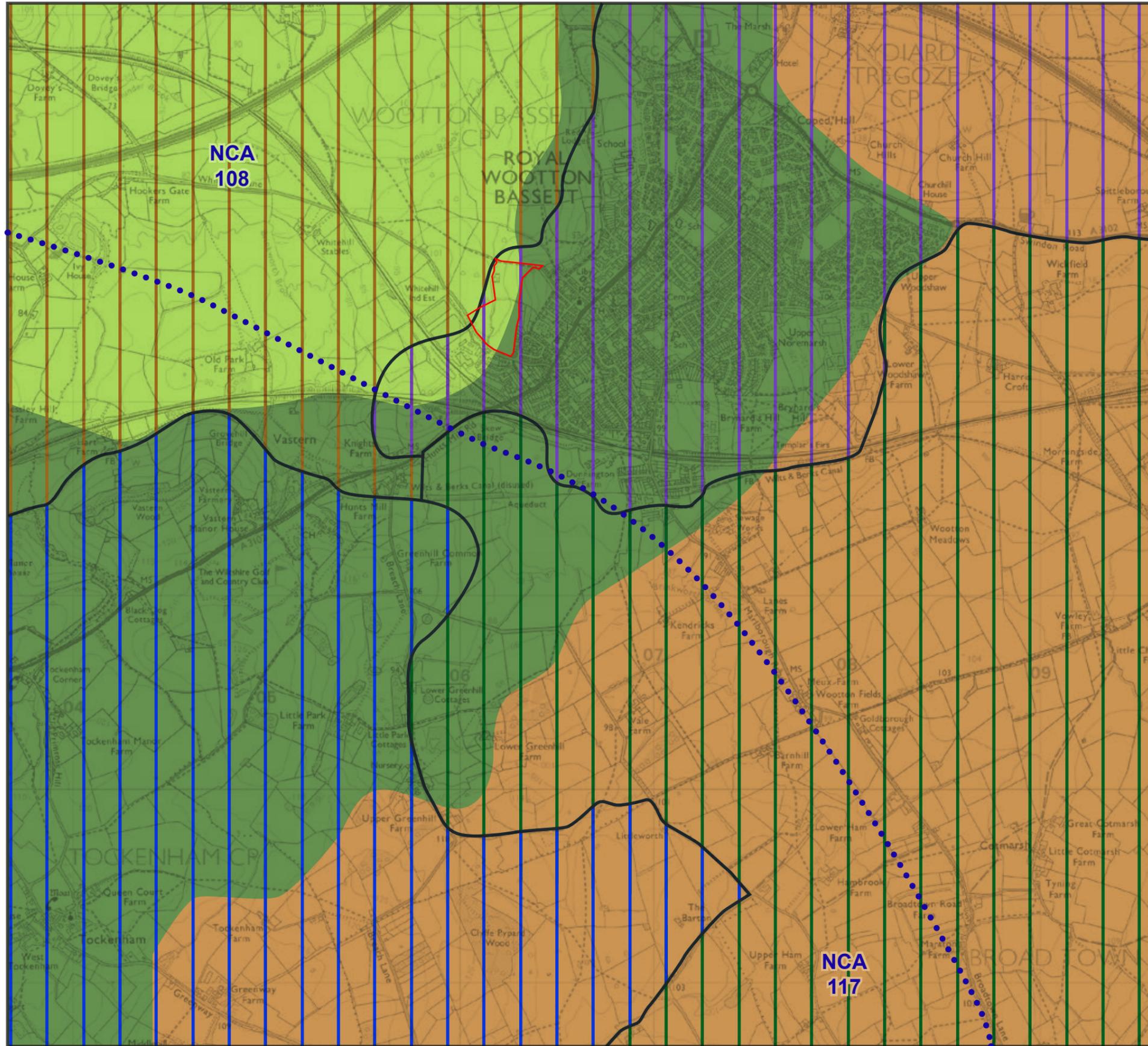
13750/P04: Landscape Character – National, County and District Context

13750/P05: Viewpoint Locations

13750/P06: Photosheets

13750/P11: Combined Opportunities and Constraints





 Site Boundary

National Character Areas

-  **NCA 108** Upper Thames Clay Vales
-  **NCA 117** Avon Vales

Wiltshire Landscape Character Assessment (2005)

-  LCT 8 Limestone Ridge (8A, Swindon - Lyneham Limestone Ridge)
-  LCT 11 Rolling Clay Lowland (11A, Calne Rolling Clay Lowland)
-  LCT 12 Open Clay Vale (12B, Avon Open Clay Vale)

North Wiltshire Landscape Character Assessment (2004)

-  LCT Urban Fringe Scarp (LCA 3, Swindon Fringe)
-  LCT Lowland Clay Farmland (LCA 14, Hillmarton Rolling Lowland)
-  LCT Settled Hill Farmland (LCA 13, Lyneham Hills)
-  LCT Lowland River Farmlands (LCA 11, Avon Valley Lowlands)

NOTE: Boundaries are based on maps within the Landscape Character Assessments and are indicative



Project Details	Land North of Whitehill Lane, Royal Wootton Bassett
Title	Landscape Character - National, County and District Context
Scale	As shown (Approximate)
Drawing Ref	13750/P04
Date	March 2021
Checked	KP/AW



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-  Site Boundary
-  Viewpoints



Project Land North of Whitemill Lane, Royal Wootton Bassett

Drawing Title **Viewpoint Location Plan**

Scale Not to Scale @ A3

Drawing No. 13750/P05

Date March 2021

Checked KP/AW





Photoviewpoint 1: Taken from Whitehill Lane, south site boundary



Photoviewpoint 2: Taken from Church Street, east of site boundary



Photoviewpoint 3: Taken from PRow, north-west of site boundary



Photoviewpoint 4: View from M4, north of site

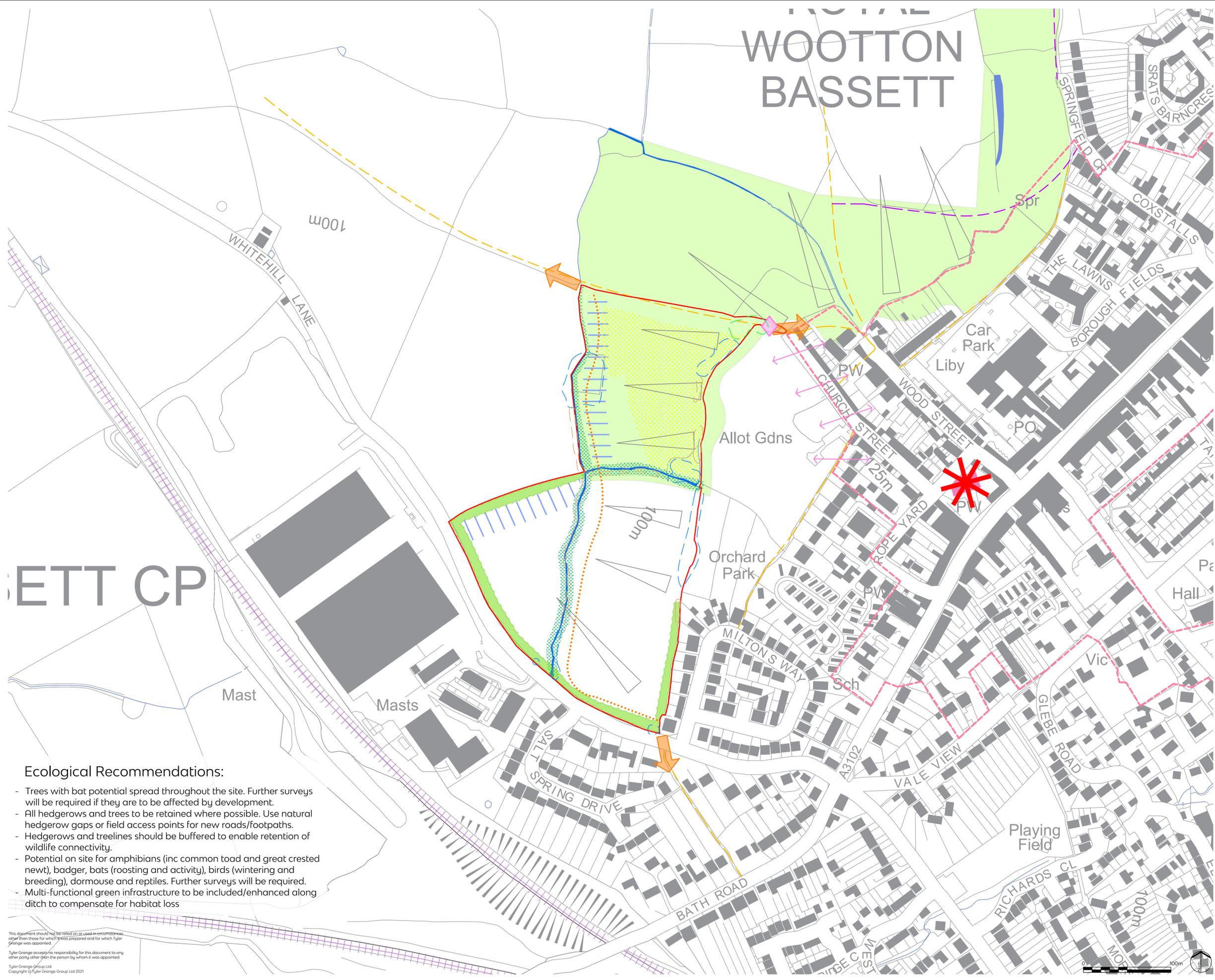


Photoviewpoint 5: Taken from Whitehill Lane, West of site



Photoviewpoint 6: Taken from Wiltshire Crescent, south-west of site

WOOTTON BASSETT



Key:

- Site Boundary
- Existing Public Right of Way to be Retained
- NDP Row-de-Dow Footpath
- Existing Sloping Topography
- Existing Thunder Brook
- NDP Town Park
- Existing Category A Trees
- Existing Category B Trees
- Existing Category C Trees
- St. Bartholomew's and All Saints Church Tower
- Listed Buildings
- Conservation Area
- Likely Site of a Windmill Mound

Landscape and Visual Recommendations

- Opportunity for new PROW route to enable connections between existing footpaths
- Facilitate non-vehicular connections east, west and south at the interchange between the settlement and wider landscape
- Opportunity for new hedgerow and trees to enclose the site and provide Green Infrastructure connectivity
- Enhancement of riparian features for ecological benefit utilising appropriate water tolerant plant species
- Avoid development on the upper, steeper slopes, closest to the conservation area
- Views to and from the conservation area to be treated sensitively
- Opportunity to create a new 'strong edge' to Royal Wootton Bassett, at the interchange with the wider landscape

Ecological Recommendations:

- Trees with bat potential spread throughout the site. Further surveys will be required if they are to be affected by development.
- All hedgerows and trees to be retained where possible. Use natural hedgerow gaps or field access points for new roads/footpaths.
- Hedgerows and treelines should be buffered to enable retention of wildlife connectivity.
- Potential on site for amphibians (inc common toad and great crested newt), badger, bats (roosting and activity), birds (wintering and breeding), dormouse and reptiles. Further surveys will be required.
- Multi-functional green infrastructure to be included/enhanced along ditch to compensate for habitat loss



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 Site 2: Land North of Whitehill Lane

Drawing title
Combined Opportunities and Constraints Plan

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 Drawn KC
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Strategic Overview of Environmental Issues

All projects
great
and small.



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Land South of Royal Wootton
Bassett

9th March 2021

TG Report No. 13750_R03_LT_HM

Report No:	Date	Revision	Author	Checked
13750_R03	9 th March 2021	-		

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Appendix:

Appendix 1: BS5837 Cascade Chart for Tree Quality Assessment

Plans:

13750/P07: Landscape Character – National, County and District Context

13750/P08: Viewpoint Location Plan

13750/P09: Photosheets

13750/P12: Combined Opportunities and Constraints



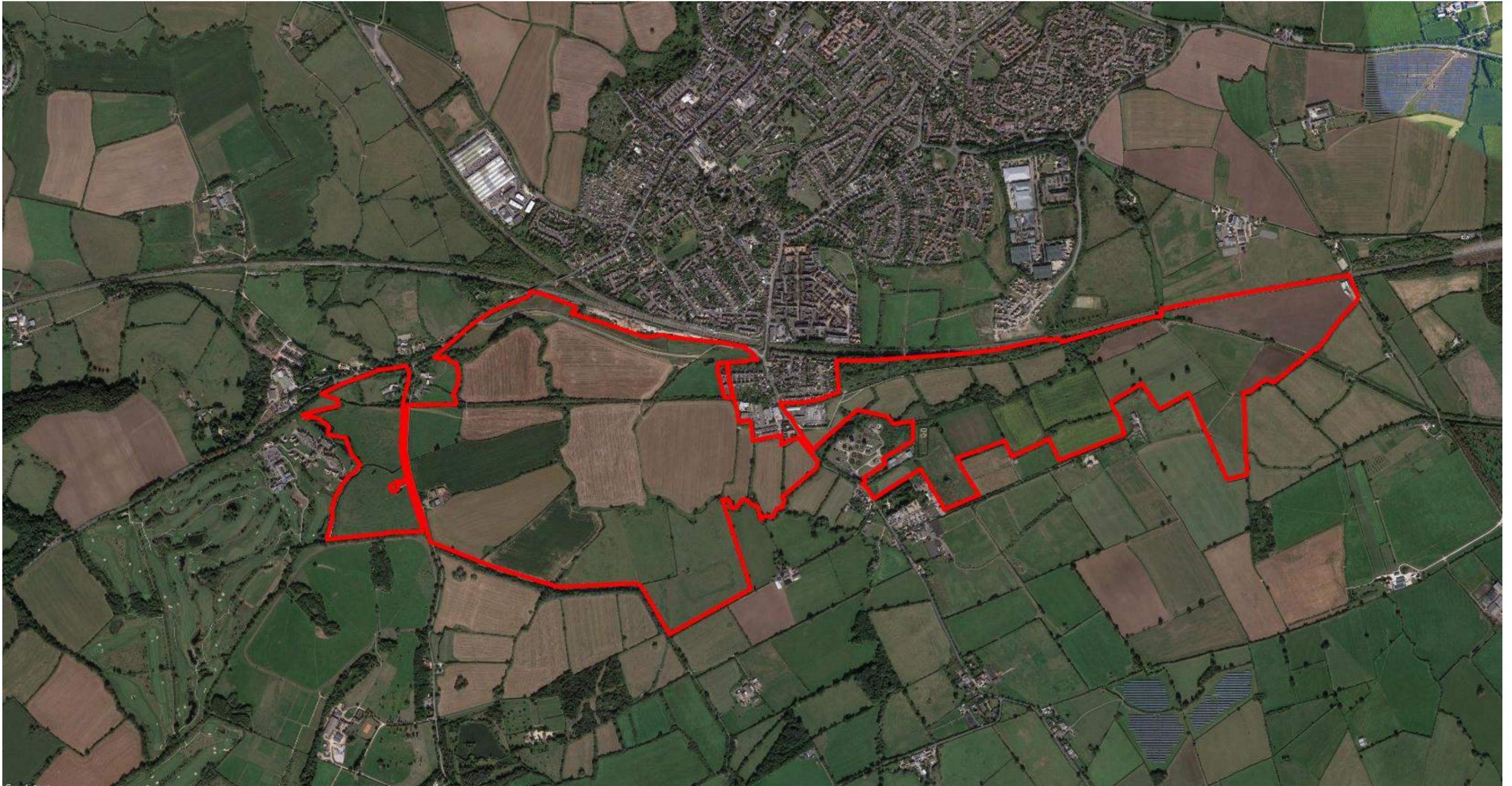


Figure 1: Site boundary and surrounding area.



Section 2: Agriculture

Planning Policy

2.1 National planning policy guidance on development involving agricultural land is set out in National Planning Policy Framework (NPPF), which was revised on the 19th February 2019. The NPPF aims to provide a simplified planning framework which sets out the Government's economic, environmental and social planning policies for England. The NPPF includes policy guidance on 'Conserving and Enhancing the Natural Environment' (Section 15).

2.2 Paragraph 170 (a and b) (page 49) are of relevance to this assessment of agricultural land quality and soil and state that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;..."

2.3 Paragraph 171 of the NPPF (2019) goes on to describe that:

"Plan should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵³ ..."

2.4 Footnote number 53 states that:

"Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality."

Wiltshire Council Core Strategy

2.5 The Wiltshire Council Core Strategy (Adopted January 2015) includes Core Policy 51 'Landscape' which states (inter alia) '...proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures', including 'iv. Visually sensitive skylines, soils, geological and topographical features'.

2.6 There is no Core Policy for development involving the Best and Most Versatile (BMV) agricultural land. In this case, consideration should be given to relevant national policy (see above).



Survey Methodology

- 2.7 This assessment is based upon the findings of a study of published information on climate, geology and soil. It follows the approach of the Ministry of Agriculture, Fisheries and Food (MAFF)¹ 'Agricultural Land Classification of England and Wales: Revised Guidelines and Criteria for Grading the Quality of Agricultural Land', October, 1988 (henceforth referred to as the 'the ALC Guidelines').
- 2.8 The ALC system provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. The ALC system divides agricultural land into five grades (Grade 1 'Excellent' to Grade 5 'Very Poor'), with Grade 3 subdivided into Subgrade 3a 'Good' and Subgrade 3b 'Moderate'. Agricultural land classified as Grade 1, 2 and Subgrade 3a falls in the 'best and most versatile' category in Paragraph 170 and 171 of the National Planning Policy Framework (NPPF) revised in February 2019. Further details of the ALC system and national planning policy implications are set out by Natural England in Technical Information Note 0492.
- 2.9 The Department for Environment, Food and Rural Affairs (Defra) has published 'Safeguarding our Soils – A Strategy for England' (24th September 2009). The Soil Strategy was published in tandem with a 'Code of Practice for the Sustainable Use of Soils on Construction Sites'³. The Soil Strategy for England, which builds on Defra's 'Soil Action Plan for England (2004-2006)', sets out an ambitious vision to protect and improve soil to meet an increased global demand for food and to help combat the adverse effects of climate change.

Agricultural Features

- 2.10 A MAFF post-1988 Agricultural Land Classification (ALC) survey of the southern half of the site shows that agricultural land with slowly permeable and seasonally waterlogged clayey Denchworth soils is limited by soil wetness to Subgrade 3b (moderate quality). The northern half of the Site has not been surveyed by MAFF but, as this desktop study has determined that most of this area is covered by Denchworth soil, it is very likely to be of Subgrade 3b quality also.
- 2.11 The land to the south West of RWB is underlain by mudstone in the Ampthill Clay Formation and Kimmeridge Clay Formation, with a small, narrow band of limestone in the Stanford Formation underlying the far north-western part of the site.
- 2.12 The predominant, heavy (clayey), slowly permeable and seasonally waterlogged soils developed from the mudstone (i.e., Denchworth Association) are limited by soil wetness to Subgrade 3b.
- 2.13 The narrow band of Sherborne soil over limestone in the northwest corner of the site is likely to be well drained, and it is likely to be restricted to Subgrade 3a or Subgrade 3b, depending on the severity of a soil droughtiness limitation (which is dependent upon the depth of soil over limestone and the amount of limestone (brash) in the soil).
- 2.14 Further to the east, the is underlain by a similar geology (i.e., mudstone in the Ampthill Clay Formation and Kimmeridge Clay Formation), which is covered by clay soils in the Denchworth Association and is limited by soil wetness to Subgrade 3b, which is outside the national BMV category, as defined in paragraphs 171 and 172 of the NPPF (2019).

¹ The Ministry of Agriculture, Fisheries and Food (MAFF) was incorporated within the Department for Environment, Food and Rural Affairs (Defra) in June 2001

² Natural England (December, 2012). 'Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049)'. Available online @ <http://publications.naturalengland.org.uk/publication/35012> Last accessed March 2021

³ Department for Environment, Food and Rural Affairs (September, 2009) 'Code of Practice for the Sustainable Use of Soils on Construction Sites'. Available online @ <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>. Last accessed March 2021



Opportunities and Constraints

- 2.15 With regard to mitigation for the for the loss of some agricultural land at the Site, and disturbing the soil thereon, current best practice on the sustainable use of soil on construction sites should be considered. Opportunities exist to strip and store soil resources (i.e., topsoil and subsoil) on Site for re-use in residential gardens, landscaping areas and open space. The sustainable use of soil as part of construction at the Site could be achieved through a suitably worded condition of planning permission, as recommended in Defra's Code of Practice (2009).

Conclusions

- 2.16 Development of predominantly clayey, slowly permeable and seasonally waterlogged agricultural land over mudstone (i.e., Denchworth Association) across the site is unlikely to harm national agricultural interests in terms of paragraphs 171 and 172 of the NPPF (2019), and relevant Development Plan policy in the Wiltshire Core Strategy (2015).



Section 3: Arboriculture

Planning Policy

- 3.1. Under the Town and Country Planning Act 1990 (as amended) the requirement to consider trees as part of development is a material planning consideration and will be taken into account in the determination of planning applications. Applicable arboricultural planning policy that relates to the site is set out below at a National and Local level.
- 3.2. At a national level, the consideration for trees is recognised in the context of their contribution to green infrastructure and biodiversity networks (Paragraph 170, 171 and 174 of the NPPF), and also in terms of their contribution in landscape terms to the local setting and character (Paragraph 170 of the NPPF). Great weight is also applied to the importance of conserving existing aged trees, including ancient woodland and trees and trees considered to be ‘veterans’ (Paragraph 175 of the NPPF). No ancient woodland was identified within influence of the site; however, two veteran trees were identified during the walkover of the site.
- 3.3. As part of the Wiltshire Core Strategy (adopted in 2015), Core Policy 50 (Biodiversity and Geodiversity) states that “development proposals must demonstrate how they protect features of nature conservation as part of the design rationale”. It goes further, stating that “where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable on circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measure can be secured to ensure no net loss of the local biodiversity resource, and secure integrity of local ecological networks and provision of ecosystem service”.
- 3.4. Core Policy 52 (Green Infrastructure (GI)) states that: “development proposals should make provision for the retention and enhancement of Wiltshire’s Green Infrastructure network. If damage or loss of existing Green Infrastructure is unavoidable, the creation of new or replacement Green Infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the Green Infrastructure network, will be required.”

Survey Methodology

- 3.5. The site walkover comprised an initial appraisal guided by BS5837:2012 to determine the quality and value of the trees present but did not constitute a fully detailed tree quality survey at this stage. Tree locations have been approximated using measurements during the tree survey and informed by aerial photography. The overall arrangement of tree cover, including tree grading value, is illustrated on the Combined Opportunities and Constraints Plan (TG Ref: 13750/P12)
- 3.6. The trees surveyed were visually inspected from ground level only and the value of trees has been assessed in accordance with the BS5837 Cascade Chart for Tree Quality Assessment (See **Appendix 1**).

Arboriculture Features

- 3.7. The walkover identified nineteen (19) trees and three (3) group of trees of high value (Category A); fifty (50) trees, thirty-five (35) groups of trees and four (4) hedgerows of moderate value (Category B); fourteen (14) trees, nineteen (19) groups of trees, forty-eight (48) hedgerows of low value (Category C) and two (2) trees recommended for removal (Category U).



- 3.8. The site's overall tree cover comprises a network of hedgerows, tree lines, scattered mature individual trees and vegetated riparian corridors that define the sites existing field pattern. The principal arboricultural features include two Crack Willow trees considered to be 'veteran' in age class, as identified on the Combined Opportunities and Constraints plan.
- 3.9. The arrangement of tree cover along the Brinkworth Brook corridor includes larger species (Crack Willow and White Poplar) up to 20 metres in height alongside scattered groups of hedgerow species (Hawthorn, Blackthorn, Elder) ranging from young to mature. The internal field hedgerow arrangement and disused canalside corridor comprises native hedgerow species with defunct Elm and scattered mature trees (Ash and English Oak), typical of the open countryside in this region.
- 3.10. No trees onsite are subject to a Tree Preservation Order, Ancient Woodland or Conservation Area designation.

Opportunities and Constraints

- 3.11. The two veteran trees are a key constraint to development on the site (under Paragraph 175 of the NPPF) as they are considered to be irreplaceable habitats and their loss or deterioration as a result of new development should be refused unless there are wholly exceptional reasons, and a suitable compensatory strategy exists. The high value features established around the site should also be retained as part of future development on site.
- 3.12. Several hedgerows across the field boundaries are defunct in parts, where sections of elm have succumbed to Dutch Elm Disease or heavy flail management has resulted in poor health and connectivity across the hedgerows. The main opportunity as part of potential development of the site is the enhancement of these features through new planting and improved management.
- 3.13. There is also an opportunity to strengthen all other boundary features, including the Brinkworth Brook and the disused canal route, to improve the landscape / Green Infrastructure framework of the site as these are the primary vegetated corridors. Further design considerations include the siting of development to avoid Root Protection Areas of trees, and the potential impacts of tree shading across new development areas. Suitable development buffers, including rear gardens if possible, should be provided adjacent to this feature to avoid social pressures to remove or cut back the trees.

Future Work

- 3.14. Should the site be considered for a future planning application, the implementation of a full BS5837:2012 Tree Quality Survey is recommended. This should inform any detailed design scheme and demonstrate compliance with local planning policy.
- 3.15. A full BS5837:2012 Tree Quality Survey will need to be based on measured topographic survey data in order to obtain accurate locations of trees and the associated design constraints. This in turn would inform the definitive development offsets, boundary treatments and design implications with respect to arboriculture.

Conclusion

- 3.16. Our initial appraisal of the site finds that there are no major issues, as far as existing trees are concerned, that affect the principle of development on the site. The areas of mature tree cover at the boundaries will need to be safeguarded which can be achieved through further survey and layout design work.



3.17. The retention and effective management of the sites field pattern structure of hedgerows and scattered mature trees will ensure a potential improvement of visual screening and habitat connectivity throughout the site area. Suitable buffers to higher value vegetation would also enable an opportunity for new tree and hedgerow planting to enhance existing vegetation that is currently deteriorating and assimilate any development within a strong landscape framework.



Section 4: Heritage

Planning Policy

- 4.1. The 1990 Planning (Listed Buildings and Conservation Areas) Act confirms that, in reaching planning decisions, the local planning authority should have special regard to preserving listed buildings and their settings, as well as the character and appearance within conservation areas.
- 4.2. The National Planning Policy Framework (NPPF, MHCLG 2019) defines ‘heritage assets’ as any aspect of the historic environment which is of such significance that it is a material consideration in planning decisions. It is noted that any harm or loss should require clear and convincing justification, with ‘substantial harm’ to or loss of designated heritage assets of the highest significance (Grade I and II*) ‘wholly exceptional’ and ‘exceptional’ for Grade II listed buildings and conservation areas (Paragraph 194).
- 4.3. Where ‘less than substantial harm’ to the significance of a designated heritage asset may be caused, the harm should be weighed against the public benefits of the proposal. Paragraph 197 notes that effects on the significance of non-designated heritage assets, including most archaeological remains, require a balanced judgement weighing the scale of impact on the significance of the heritage asset against the benefits of the proposed development. Where heritage assets are to be lost. Paragraph 199 confirms that an appropriate record of the elements to be lost should be provided for.

Survey Methodology

- 4.4. For previous surveys undertaken for the western section of the site, Wiltshire Historic Environment Record (HER) and archives in Trowbridge were originally consulted as was the Historic England Archive in Swindon. These and online sources informed site walkovers. More recently, TG has been instructed to also consider land south east of RWB. Wiltshire Historic Environment Record (HER) and online sources informed a site walkover of the south eastern area and its environs in February 2021. The south western area was also checked at this time. New HER data was also secured for the area to the south west.

Heritage Features

- 4.5. Hunt Mill Farm farmhouse in the north west of the site is Grade II listed (see **Plan 13750/P12** for locations). The farmhouse and curtilage listed outbuildings could be re-used in any scheme, or excluded from it. Where demolition is required, there should be appropriate building recording in advance of demolition. The proposals are unlikely to harm the setting of a Grade II listed 19th century railway bridge on the north western edge of the site given its modern context following electrification of the mainline. A related Grade II listed railway bridge at the eastern edge of the site could be protected through suitable landscaping.
- 4.6. Two scheduled monuments lie north of the railway and the site: medieval earthwork settlement remains south of Lower Woodshaw Farm and an earthen mound which supported a post-medieval windmill historically at Brynard’s Hill. The medieval earthwork’s setting may need to be protected by planting south of the railway, although this itself provides considerable screening. The windmill mound is small and completely encircled by 20th century housing.
- 4.7. Proposed development would be unlikely to affect any other designated heritage assets given topography, vegetation and existing buildings, with the Grade II listed Lower Woodshaw Farm



farmhouse screened by dense vegetation. Other designated assets in Royal Wootton Bassett including the town centre conservation area and listed buildings within it are surrounded by more recent built development. New development should allow views to the parish church which, given its prominent position is visible from within and beyond the site, but this would be to link new housing to the settlement rather than in mitigation of any harm.

- 4.8. The site also has the course of the Wilts and Berks Canal running through it from east to west. This was completed in the early 1800s and ceased operation a century later. Some of its course through the site is open water and a Public Right of Way follows its towpath east of Marlborough Road.
- 4.9. The eastern end of the canal within the site is less well preserved, as are parts in the west, which does not have public access. In the west, over half its line is now only marked by a band of scrub, although banks and canal are evident as shallow earthworks for the remainder of its length west of Marlborough Road.
- 4.10. Although a brick aqueduct carries the canal across the Brinkworth Brook in the west of the site, there is no sign of Dunnington locks to the east. Retention and enhancement of the line of the canal, possibly including reinstatement and repair of the aqueduct and a brick bridge in the east, would be positive in heritage terms.
- 4.11. The cartographic sources go back to the late-18th century and confirm the site area was agricultural at this time prior to the canal cutting through the site. No likely agricultural buildings shown on earlier maps now survive within the site. A post-medieval cottage, remains of a track and other features which survive in of the site would only rate as of local interest.
- 4.12. Further earthworks survive in pasture fields in the south east of the site. These are broad ridge and furrow which are likely to reflect medieval open field cultivation of Wootton Bassett's 'west field'. Aerial Photographs suggest that much of the site was covered by such earthworks under pasture seventy years ago, but that arable cultivation has erased most traces.
- 4.13. The site appears to have been a mix of meadow land by the brook, cultivated strip fields and common land in the medieval period. The only settlement is likely to have been at Hunt Mill Farm, where a pottery kiln is also known to have lain. Subsequent change, including the loss of ridge and furrow, enclosure of open fields and meadows, and construction of the mainline railway and canal across the earlier field pattern mean the site's landscape is of no particular significance in heritage terms. However, older field boundaries marked by hedgerows and ridge and furrow have local significance and should be retained as far as is practicable.
- 4.14. There are some hints of Bronze Age, Iron Age and Roman activity from sites and finds recorded by the HER and the wider area was certainly settled by the Neolithic. The absence of other records is likely to be a reflection of an absence of past investigation and further hitherto undiscovered remains of prehistoric or Roman date may lie within the site. However recent work at Brynard's Hill, north of the site and monitoring of a pipeline which ran through the east of the site failed to record anything significant.

Opportunities and Constraints

- 4.15. In accordance with current policy and practice, further archaeological investigation will be required ahead of planning permission being granted. Fieldwork might include geophysical survey and trial trenching. This would confirm the nature and significance of any sub-surface features within the site. It is most likely that any remains will rate as of no greater than local significance and could consequently be investigated in advance of construction to ensure compliance with policy.
- 4.16. The proposals also represent an opportunity to enhance the canal running across the site, with reinstatement of silted up sections and repair of structures adding to the existing lengths which are water filled and publicly accessible. Some more common features including areas of ridge and furrow and hedgerows would likely be lost, but those of these features which are retained could be managed to ensure their long-term preservation.



Conclusion

4.17. In conclusion, no heritage issues that would affect the principle or quantum of development have been identified. There is every reason to expect that allocation and future development of the site could accord with relevant planning policy and legislation that seeks to protect and enhance heritage resources and their settings.



Section 5: Ecology

Planning Policy

5.1. Section 15 of the NPPF (paragraphs 170 to 177) considers the conservation and enhancement of the natural environment. In summary, planning and decisions should:

- Contribute to and enhance the natural and local environment;
- distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries; and
- Protect and enhance biodiversity and geodiversity.

5.2. Core Policy 50 (Biodiversity and Geology) of the Wiltshire Core Strategy⁴ (adopted in 2015) describes how developments must “*demonstrate how they protect features of conservation and geological value as part of the design rationale*”. It goes further, stating “*an expectation that such features be retained, buffered and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term*”. In addition, there is a requirement to provide biodiversity enhancement, particularly within larger developments, which will contribute to the conservation objectives and targets of the Biodiversity Action plan (BAP) and/or the relevant River Basin/Catchment Management Plan.

5.3. Core Policy 52 (Green Infrastructure (GI)) states, amongst others, a requirement for the retention and enhancement of existing onsite GI, appropriate measures to ensure long-term management of GI related to the development, appropriate contribution towards the delivery of the Wiltshire Green Infrastructure Strategy⁵ and provision of opportunities to enhance natural linkages throughout Wiltshire.

5.4. Core Policy 53 (Wiltshire’s Canals) requires that the canal line is protected with a view to the long-term re-establishment as a navigable waterway. It states that “*proposals will be permitted that are designed to develop the canal’s recreational and nature conservation potential, in particular, the use of the old line of the canal for walking, cycling and interpretation*”.

5.5. Item ii of Core Policy 57 (Ensuring high quality design and place shaping) states “*the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development*”.

⁴ <https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wcs.pdf?m=637099399373530000>

⁵ https://cms.wiltshire.gov.uk/documents/s156001/GI_slides.pdf



Survey Methodology

5.6. A desk-based study was conducted whereby records of designated sites and records of protected and priority species were purchased and interrogated for the site and its environs. The following resources were consulted / contacted:

- Multi-Agency Geographic Information for the countryside (MAGIC) website⁶;
- Wiltshire & Swindon Biological Record Centre (WSBRC);
- Joint Nature Conservation Committee (JNCC) website;
- Natural England (NE) designated sites website;
- Ordnance Survey mapping; and
- Google Maps, including aerial photography and Google StreetView.

5.7. The following areas of search around the red line boundary of the site (red line shown on **Plan 13750/P12**) were applied:

- 1km for protected and priority species;
- 2km for non-statutorily designated sites;
- 5km for statutorily designated sites (excluding European sites); and
- 10km for European statutory sites.

5.8. A site visit was undertaken on 22nd February 2021. An 'extended' Phase I habitat survey where habitats and dominant plant species were identified and mapped was undertaken. The methods used during the walkover surveys broadly followed methods outlined in the JNCC Phase I habitat survey handbook⁷. This technique provides an inventory of the habitat types present and dominant species.

5.9. During the site visit, any evidence or potential for protected/priority fauna was also identified, including any evidence of badger and assessing tree for bat roosting potential. A Habitat Suitability Index (HSI) assessment of all ponds onsite and adjacent to the boundaries (where possible) was also undertaken.

5.10. The weather conditions during the survey were mostly dry with light rain at the beginning of the day, with a calm wind and a temperature of 7°C.

⁶ <https://magic.defra.gov.uk/MagicMap.aspx>

⁷ <https://data.jncc.gov.uk/data/9578d07b-e018-4c66-9c1b-47110f14df2a/Handbook-Phase1-HabitatSurvey-Revised-2016.pdf>



Limitations

- 5.11. The survey undertaken was a high-level survey. As such, the habitats have been very broadly characterised and not every hedgerow was walked. Further surveys will be required to obtain more detail of the habitat types and presence of fauna.
- 5.12. Due to the time of year, not all plant species may have been visible. That said, it is unlikely to alter the habitat type assigned.

Ecological Features

- 5.13. Following the Phase I habitat survey, the site was found to comprise mostly arable fields. Other habitats on site are improved grassland, species-poor semi-improved grassland and tall ruderal/pioneer vegetation between the cycle path and the railway. All fields are bounded to some extent by native hedgerows or tree lines, all with varying management regimes and many with associated scrub patches. Mature trees are also present throughout the site, some associated with hedgerows and tree lines, but others are of a “parkland” nature, particularly towards the east of the site.
- 5.14. The brook corridor is mainly comprised of scrub, tall ruderal and mature tree lines with some patches of wetland vegetation, such as common reed *Phragmites australis*, along its length. The old canal line consists of similar habitats to the brook corridor; however, a series of linked waterbodies are now also present in lieu of the canal.
- 5.15. There are also several ponds, an old reservoir, several buildings and a series of mudsprings present within the site boundary.
- 5.16. The desk study identified no internationally designated sites within 10km of the site boundary, however there are eleven Sites of Specific Scientific Interest (SSSI) within 2km, the nearest ecological SSSI being the Goldborough Farm Meadows SSSI which lies c. 0.8 km to the south-east of the site boundary. The Wootton Bassett Mud Springs SSSI, designated for geological reasons, lies within the site boundary. There are also several non-statutorily designated sites within 2km: one Local Nature Reserve (LNR), Jubilee Lake which lies c. 1.85km to the north, and five Local Wildlife Sites (LWS), the nearest being Morningside Meadows Wiltshire Wildlife Trust Nature Reserve which lies directly adjacent to the eastern boundary of the site.
- 5.17. Biological records purchased from the Wiltshire & Swindon Biological Record Centre (WSBRC) identified records for a variety of fauna, both on site and within the wider area. Table 5.1 below outlines those records as well as the potential for each species on site.

Species/Group	Records within 2km	Potential on site
Amphibians	WSBRC returned records of great crested newt <i>Triturus cristatus</i> within the site boundary in 16/04/2015 Records were returned for common toad <i>Bufo bufo</i> , the nearest being c. 0.3km north-east of the site in 09/05/2011.	Potential onsite limited to hedgerow bases and grassy/tall ruderal vegetation along the brook corridor and canal line. One pond onsite in the very south-eastern field and 16 within 500m of the site boundary.
Badger	WSBRC returned records of Eurasian badger <i>Meles meles</i> within the site (latrine) (22/02/2014)	Potential for foraging on site within the grassland fields. Also potential for setts along treelines and the canal line embankments.
Bats	WSBRC returned records of common pipistrelle <i>Pipistrellus pipistrellus</i> c. 0.4km S of the site boundary in 01/06/2015. Records were also returned for greater horseshoe bat <i>Rhinolophus ferrumequinum</i> , lesser horseshoe bat <i>Rhinolophus hipposideros</i> , serotine <i>Eptesicus serotinus</i> , Brandt's bat <i>Myotis brandti</i> , Daubenton's bat <i>Myotis daubentonii</i> , whiskered bat <i>Myotis mystacinus</i> , Natterer's bat	Trees throughout the site with potential for roosting bats. Linear features on site such as tree lines, hedgerows, canal line and brook corridor may act as commuting and foraging corridors.



	<i>Myotis nattereri</i> , noctule <i>Nyctalus noctula</i> , pipistrelle species and brown long eared bat <i>Plecotus auritus</i> .	
Birds	<p>WSBRC returned records of red-listed BoCC⁸ including lapwing <i>Vanellus Vanellus</i>, European herring gull <i>Larus argentatus</i>, curlew <i>Numenius Arquata</i>, woodcock <i>Scolopax rusticola</i>, cuckoo <i>Cuculus canorus</i>, Eurasian skylark <i>Alauda arvensis</i>, yellowhammer <i>Emberiza citrinella</i>, lesser repoll <i>Acanthis cabaret</i>, linnet <i>Linaria cannabina</i>, grasshopper warbler <i>Locustella naevia</i>, grey wagtail <i>Motacilla cinerea</i>, spotted flycatcher <i>Muscicapa striata</i>, marsh tit <i>Poecile palustris</i>, house sparrow <i>Passer domesticus</i>, starling <i>Sturnus vulgaris</i>, redwing <i>Turdus iliacus</i>, song thrush <i>Turdus philomelos</i> and fieldfare <i>Turdus pilaris</i> from the surrounding area.</p> <p>WSBRC returned records of amber-listed BoCC including common tern <i>Sterna hirundo</i>, green sandpiper <i>Tringa ochropus</i>, kingfisher <i>Alcedo atthis</i>, red kite <i>Milvus milvus</i>, western osprey <i>Pandion haliaetu</i>, peregrine <i>Falco peregrinus</i> and western barn owl <i>Tyto alba</i> within the surrounding area.</p>	<p>Potential for nesting birds within all hedgerows and trees on site.</p> <p>Also potential for breeding and wintering birds within the grassland and arable fields.</p>
Brown hare	WSBRC returned records for brown hare <i>Lepus europaeus</i> c. 0.6km NE of site boundary in 06/04/2000.	Two brown hare observed within arable fields during the survey.
Dormouse	No records for dormouse <i>Muscardinus avellanarius</i> returned.	Potential onsite within all hedgerows and tree lines.
Hedgehog	WSBRC returned records for hedgehog <i>Erinaceus europaeus</i> c.0.4km NE of site boundary in 17/09/2019.	Potential onsite within all hedgerows and tree lines.
Invertebrates	WSBRC returned records of common darter <i>Sympetrum striolatum</i> recorded along the canal c.0.1km NE in 29/07/2018.	Potential on site, particularly along the brook corridor and canal line.
Otter	WSBRC returned records of otter <i>Lutra lutra</i> c.2.5km E of site boundary in canal in 20/04/2017.	Potential to be present in the brook and canal and their associated habitats.
Reptiles	WSBRC returned records of slow worm <i>Anguis fragilis</i> within the site boundary in 05/05/2015.	Potential within the tall ruderal and longer areas of grass along the brook corridor and canal line. Also hibernation potential in the hedgerow bases.
Water vole	WSBRC returned records of water vole <i>Arvicola amphibius</i> from within the site boundary in 07/10/2017.	Potential to be present in the brook and canal and their associated habitats.
Plants	WSBRC returned records of strawberry clover <i>Trifolium fragiferum</i> c. 0.1km E of the site boundary in 15/08/2019 and field cow wheat <i>Melampyrum arvense</i> c. 0.15km NE in 05/07/2019.	Potential for notable species within the brook corridor, canal line, tall ruderal and grassland fields.

Table 5.1: Records returned from within 1km of the site boundary.

Opportunities and Constraints

5.18. Ecological opportunities and constraints are set out on **Plan 13570/P12** and broadly described below.

5.19. The only important habitat features comprise hedgerows, treelines, the brook corridor and old canal line. These should be incorporated into the multi-functional green/blue infrastructure of the site, providing dark corridors to allow wildlife to continue to move through the site and sustainable drainage systems with associated wetland planting to encourage new invertebrate species.

⁸ Birds of Conservation Concern https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf



5.20. Whilst canal restoration can incorporate important ecological features, the existing wetland habitat and associated opportunities for wetland fauna within the disused canal corridor would be disturbed in the event of the re-instatement of the canal, something that local policy supports. If that is to be delivered as part of this site's development then, given the size of the site, there should be opportunities to mitigate within the site boundary.

5.21. It is considered that the development could be designed to be in conformity with local and national planning policy and legislation by adopting the following principles:

- Hedgerows should be enhanced through infill planting with native, ecologically beneficial stock, improving opportunities a wide variety of species including birds and bats.
- Transitional buffers along the hedgerows and tree lines will protect these important features and improve the linkages through the site for many species.
- The brook and canal corridors should be enhanced into wildlife areas, accessible to the public by informal mown paths, interactive nature trails and interpretation boards guiding them through, providing easy access to nature and education opportunities.
- Provision of bat and bird boxes on retained trees and integrated into new buildings will enhance nesting and roosting opportunities within the site;
- Provision of reptile hibernacula, hedgehog houses and insect hotels will encourage these species to utilise the site;
- An appropriate lighting strategy (which could be controlled by way of a condition on any future consent) would ensure new lighting is be designed sensitively to avoid impacts to light-intolerant bat species and will allow the retention of dark corridors throughout the site; and
- Building with Nature⁹, the UK's first green infrastructure benchmark providing "a framework of quality standards, an assessment and accreditation service and national awards recognising the design and delivery of high-quality green infrastructure", could be considered for this site.

5.22. Provision of a Landscape and Ecological Management Plan (LEMP), which could be controlled by planning condition, will be fundamental to the delivery of habitat creation and enhancements to mitigate for the losses required and delivery net gains for biodiversity;

5.23. Given the size of the site and presence of (and potential for) ecological features of local importance, a green infrastructure lead development would be appropriate, to provide confidence that relevant national and local policies can be met, including biodiversity net gain. This also has distinct advantages in terms of placemaking and ultimately sales.

5.24. To assist in the development of a masterplan and ultimately inform a planning application, early consultation with *inter alia*, the planning authority is recommended. The following detailed surveys may be required, although some requirements can be avoided if potential habitats are not being impacted:

- Badger,
- Bats (activity and roosting – trees and buildings);
- Birds (breeding and wintering);

⁹ <https://www.buildingwithnature.org.uk/about>



- Dormouse;
- Great crested newt;
- Otter;
- Reptiles; and
- Water vole.

5.25. Whilst the Wootton Bassett Mud Spring SSSI is not notified for its ecological importance, it will be necessary to ensure that the hydrological regime that maintains its interest is not affected by future development, something that would be confirmed by hydrologists and engineers at the appropriate stage, in consultation with Natural England.

Conclusion

5.26. In conclusion, no ecological issues that could affect the principle of development of the site have been identified. Those valuable ecological resources that exist, or could exist, within the site could be accommodated by the adoption of appropriate design principles.



Section 6: Landscape

Planning Policy

- 6.1. The site is not subject to any national or local landscape designations.
- 6.2. Within the Royal Wootton Bassett made Neighbourhood Development Plan (NDP) (2018), improvement to the canal is identified within the NDP as one of Royal Wootton Bassett's infrastructure requirements.
- 6.3. At a District level, the spatial strategy for Royal Wootton Bassett is identified within Core Policy 19 of the Adopted Wiltshire Core Strategy (WCS) (2015). Issues and considerations to be addressed in planning for the area include protection of the character and identity of the open countryside, consideration of environmental constraints including areas prone to flooding and an SSSI to the south, conservation of the North Wessex Downs AONB and its setting (located near Broad Town to the south-east of Royal Wootton Bassett), improvements to the Wilts and Berks Canal and their historic alignment and the maintenance and enhancement of the Great Western Community Forest (which the site lies within) as a significant infrastructure resource.
- 6.4. More general policy considerations relevant to landscape and/or visual matters include as follows:
 - NDP Policy 7: Design - Development must respect local character and conserve or enhance heritage assets in a manner appropriate to their significance.
 - NDP Policy 10: Landscape Setting - Development should safeguard the separate identity and locally distinctive character of Royal Wootton Bassett and its unique landscape setting.
 - North Wiltshire Saved Policy ND14: Trees, Site Features and the Control of New Development - permission will not be granted for proposals that would result, or be likely to result, in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features that could be successfully and appropriately incorporated into the design of a development.
 - WCS Core Policy 51: Landscape (supported by Topic Paper 5: Natural Environment) – Development should protect, conserve and where possible enhance landscape character. Proposals will need to demonstrate the following aspects of landscape character have been considered:
 - *“The locally distinctive pattern and species composition of natural features;*
 - *The locally distinctive character of settlements and their landscape settings;*
 - *The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe;*
 - *Visually sensitive skylines, soils, geological and topographical features;*
 - *Landscape features of cultural, historic and heritage value;*
 - *Important views and visual amenity;*



- *Tranquility and the need to protect against intrusion from light pollution, noise and motion;*
- *Landscape functions including places to live, work, relax and recreate;*
- *Special qualities of AONBs.”*
- WCS Core Policy 52: Green Infrastructure (GI) (supported by Wiltshire’s GI Strategy and update) – Development shall make provision for the retention and enhancement of Wiltshire’s GI network. Where development is permitted, the following is required:
 - *“Retain and enhance existing on site GI;*
 - *Make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards;*
 - *Put measures in place to ensure the long-term management of any GI;*
 - *Provide appropriate contributions towards the delivery of the Wiltshire GI Strategy;*
 - *Identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.”*
- WCS Core Policy 53: Wiltshire’s Canals – The restoration and reconstruction of the Wilts and Berks canals as navigable waterways is supported in principle. The historic alignment of this will be safeguarded with a view to the long-term re-establishment of the route as a navigable waterway. Development will not be permitted which is likely to destroy the canal alignment or associated structures or likely to make restoration more difficult.
- WCS Core Policy 57: Ensuring High Quality Design and Place Shaping – Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

Landscape Character

6.5. From a published perspective, the site lies within the following landscape character types/areas:

- National Character Areas;
 - 108: Upper Thames Clay Vales;
 - 117: Avon Vales.
- Wiltshire Landscape Character Assessment (2005);
 - Landscape Type (LT) 8 – Limestone Ridge and Landscape Character Area (LCA) 8A – Swindon-Lyneham Limestone Ridge ; and



- LT 11 – Rolling Clay Lowland and LCA 11A – Calne Rolling Clay Lowland
- North Wiltshire Landscape Character Assessment (2004)
 - Urban Fringe Scarp Landscape Character Type (LCT) and LCA 3 – Swindon Fringe;
 - Open Clay Vale LCT and LCA 11 - Avon Valley Lowland;
 - Settled Hill Farmland LCT and LCA 13. Lyneham Hills; and
 - Lowland Clay Farmland LCT and LCA 14. Hilmarton Rolling Lowland.

6.6. The locations of these areas in relation the site are illustrated by plan reference 13750/P07.

6.7. Whilst National Character is relevant as forming the background to the District level assessments, the characteristics and opportunities identified are too broad for the nature of this analysis.

6.8. At a District scale, the western portion of the site (located to the west of Marlborough Road) reflects three of the main published LCTs:

1. The Urban Fringe Scarp LCT and LCA 3: Swindon Fringe to the north reflects the urban fringe influence and context close to the railway corridor and disused canal.
2. The second and largest character area relates to the central part of the site, LCT Lowland Clay Farmland and LCA 14: Hilmarton Rolling Lowland LCT. Characteristics relate to low lying agricultural land, a mixed patchwork of fields and hedgerow boundaries.
3. A small parcel of higher land around Greenhill Common Farm and Hunts Mill Farm lies within the Settled Farmland LCT and 13: Lyneham Hills LCA. On the very edge of this LCT/LCA the landform and views out to the surrounding landscape are characteristics shared with the site.

6.9. At a District scale, the eastern portion of the site (located to the east of Marlborough Road) reflects the Urban Fringe Scarp and Lowland Clay LCTs. The Urban Fringe Scarp LCT and LCA 3: Swindon Fringe to the north-west reflects the urban fringe influence and context close to the railway corridor. The second and largest character area relates to the majority of the site, LCT Lowland Clay Farmland and LCA 14: Hilmarton Rolling Lowland LCT. Characteristics relate to low lying agricultural land, a mixed patchwork of fields and hedgerow boundaries.

6.10. The key published management objectives that are considered to be relevant to the site and its immediate environs include as follows:

- *“Restore and re-plant hedgerows and specimen trees, especially oak and ash, or willow and poplar on wetter areas. Retaining variation between dense outgrown hedges of secluded valleys and open character on more exposed ground;*
- *Consider where development related to principal settlements is most appropriate in terms of landscape and visual effects;*
- *Ensure development reinforces the locally distinctive character and respects the vernacular, and incorporates landscape mitigation to minimise adverse effects on the landscape and visual amenity;*



- *Identify and seek opportunities to create new woodland belts and copses, in particular to help screen and contain settlement;*
- *Maintain and use footpath network to offer local people recreational opportunities in terms of countryside access routes and cycleways; and*
- *Enhance the valley bottom character along watercourses by planting willows in informal groups and broken lines. Conserve and maintain river corridors, valley bottom pasture and meadows and riparian vegetation.”*

6.11. The key observations of the site from the field visit in relation to the local landscape are summarised as follows:

6.12. The western portion of the site (located to the west of Marlborough Road):

- Predominantly low-lying land 85m AOD, rising in the south east to Greenhill Common Farm 116m AOD;
- Meandering, treelined and well vegetated Brinkworth Brook is a strong feature of the flatter landform with connectivity through a series of drains and ditches;
- Arable mainly on higher ground with wet pasture on lower ground and an irregular field pattern;
- Strong pattern of well managed hedgerows and mature hedgerow trees along field boundaries;
- Deciduous woodland blocks prevalent to the west and south;
- Small rural lanes with hedgerows to the south;
- Features of historical interest include the disused canal, listed buildings, elements of the railway corridor and remnants of ridge and furrow;
- Dwellings off Dunnington Road and the Templars Way Industrial Estate together with the settlement of Royal Wootton Bassett provide a context of built form;
- Presence of power lines erodes its sense of rurality as well as the visual intrusion of the M4 to the west; and
- Overlooked by Royal Wootton Bassett to the north.

6.13. The eastern portion of the site (located to the east of Marlborough Road):

- A largely flat landscape with a gentle slope eastward (90m AOD at the sewage works to the west of the site to 100m AOD beyond the western edge of the site, at Padbrook Farm);
- The Wilts & Berks canal is a strong feature within the northern edge of the site, well-used as a recreational route and destination within this part of Royal Wootton Bassett;
- Meandering, treelined and well vegetated tributary of Brinkworth Brook mirroring the route of the canal, with a woodland copse which is an SSSI along its length and connecting with the canal to the east;



- There is a distinct change in character across the site. The northern parcel comprises scrub vegetation, unmanaged grassland and linear tree belts, influenced by the adjacent industrial units and development completing construction to the west. Of the southern parcel, the eastern edge is of a larger scale, arable land use with neat hedgerows and isolated large stature trees which culminates in a more ‘undeveloped character’, whilst the western edge is influenced by the adjoining settlement, is small in scale and comprises a mix of pasture and arable with linear tree belts and woodland copses to the field boundaries. The western parcel (beyond Marlborough Road) is of a small scale, pasture land use, heavily influenced by the presence of Brinkworth Brook and somewhat influenced by the surrounding settlement. This part of the site is enclosed in nature ;
- Morningside Meadows (owned by the Wiltshire Wildlife Trust) located abutting the south-eastern boundary of the site is well-used for recreation and provides a wet-meadow character within this part of the landscape;
- Numerous public rights of way present across the site provide linkages to the north, east, south and west. This includes two footpath connections with Brynard’s Hill Country Park to the north;
- The site is influenced by the railway line to the north and fast-moving vehicles along Marlborough Road to the west, with a rural lane to the south. The site lies within a settlement-edge location which is most apparent to the north and west of the site, although visual connection towards Royal Wotton Bassett remains across the site, where the settlement overlooks the site to the north;
- Features of historical interest include the disused canal, listed buildings, elements of the railway corridor and a scheduled ancient monument in the north.

6.14. Key opportunities in respect to landscape character for the site are identified as follows:

- Deliver multi-functional GI for health and wellbeing and biodiversity enhancement (green spaces, play provision, footpaths, cycleways, and new planting);
- Strengthen boundaries within the site;
- Increase woodland planting;
- Make provision for views to St Bartholomew’s and All Saints Church tower;
- Provide a management strategy for the urban edge; and
- Enhance the character of the floodplain (note flood zones 2 and 3 are relevant) Brinkworth Brook and the canal corridor.

Views and Visibility

6.15. For the purposes of informing this analysis, the identification of viewpoints has been determined from selected external spaces within the public domain. The locations are illustrated by **Plan 13750/P08** and the photographs are contained within photosheets, **Plan 13750/P09**. Photographs taken from twenty-four locations (in winter) were selected to provide a representation of local and wider views from within an initial computer-generated Zone of Theoretical Visibility (ZTV). The ZTV is generated based on landform data only and does not include features such as



trees and built form which limit visibility within the landscape. Field verification is therefore essential and has been undertaken as part of this analysis.

6.16. The key observations of the western portion of the site (to the west of Marlborough Road) from the field visit in relation to views and the visual context are summarised as follows:

- The site is visible from a wide area particularly from the elevated landform to the north (at Brynard's Hill Country Park) and southeast (near the Broad Town White Horse monument), which is located within the North Wessex Downs AONB.
- Views of the site from within the AONB are limited by the distance of the view, intervening built form and vegetation and the panoramic nature of views (near the Broad Town White Horse monument), where the site forms a small part of the wider panorama.
- Views towards Royal Wootton Bassett generally are characterised by a mix of rural foreground including strong belts or blocks of woodland, hedgerows and hedgerow trees, the presence of farmsteads and clusters of residential, criss-crossed by transport corridors (road and rail).
- Royal Wootton Bassett sits on higher ground overlooking the site to the north, with St Bartholomew's and All Saints Church tower a visual landmark feature.
- Sections of the M4 are visible from higher ground.
- Small pockets of woodland, hedgerows and hedgerow trees soften the appearance of the settlement in views.
- The land slopes within the south-west of the site up to 116m AOD, this is a slope from 85m AOD along Brinkworth Brook (increase in 31 meters). There are views to and from the wider landscape of this part of the site, given the higher level in which it lies.
- There are only a few Public Rights of Way within the site, located to the far eastern and western edges of the site. Although it was observed in the field that the northern part of the site and disused canal is well-used by people for dog walking and recreation.
- Private views from new multi-storey dwellings on rising land are potentially afforded alongside private views from scattered residential dwellings to the north, south and east, the retirement village and scattered dwellings to the west, views from commercial buildings and views from the surrounding road and rail network.

6.17. The key observations of the eastern portion of the site (to the east of Marlborough Road) from the field visit in relation to views and the visual context are summarised as follows:

- The site is visible from a wide area particularly from the elevated landform to the north (at Brynard's Hill Country Park) and southeast (near the Broad Town White Horse monument), also within the North Wessex Downs AONB.
- Views of the site from within the AONB in general are limited by the distance of the view, intervening built form and vegetation and the panoramic nature of views (near the Broad Town White Horse monument), where the site forms a small part of the wider panorama.
- There is an opportunity to utilise existing views towards the Broad Town White Horse Monument from within the north-western portion of the site, where it is currently visible in the distance.



- Views towards Royal Wootton Bassett generally are characterised by a mix of rural foreground including strong belts or blocks of woodland, hedgerows and hedgerow trees, the presence of farmsteads and clusters of residential, criss-crossed by transport corridors (road and rail).
- Royal Wootton Bassett sits on higher ground overlooking the site to the north, with Brynard’s Hill Country Park a visual landmark feature.
- Small pockets of woodland, hedgerows and hedgerow trees soften the appearance of the settlement in views.
- There are many public footpath routes within the site, which connect in all directions. The Wilts & Berks canal in the north of the site is well-used for recreation and a destination for people within Royal Wootton Bassett to enjoy. There are also direct footpath connections between the site and Brynard’s Hill Country Park.
- Private views from dwellings on rising land are potentially afforded alongside private views from residential dwellings immediately to the north and west and scattered dwellings to the south and east. It is likely there are also views of the site from commercial buildings and views from the surrounding road and rail network.

Opportunities and Constraints

6.18. As illustrated by **Plan 13750/P12**, the key landscape and visual recommendations for the site are summarised as follows:

- Located on the edge of Royal Wootton Bassett there are opportunities to address the character of the urban fringe and include new woodland blocks to soften development within the site, at this interface with the wider landscape. This will also assist in ensuring that the character of views from the North Wessex Downs AONB is consistent with the existing situation.
- Existing small woodland blocks and boundary hedgerows should be retained and enhanced wherever possible in order to ensure longevity in connectivity. Additional woodland blocks and hedgerows would be appropriate in this landscape, especially at field corners where they would also filter views of the development from Royal Wootton Bassett as they mature and where they would provide further connectivity. This will enhance the landscape and ensure the longevity of tree cover, at an appropriate scale in this location.
- Evidence of ridge and furrow landscape to the south of the site should be protected and considered in the design of open space if possible.
- There is an opportunity to define a new vista towards St. Bartholomew’s and All Saints Church tower from within the site which can also ensure a visual relationship with the existing core of Royal Wootton Bassett is retained. There is also the opportunity for a link to be provided between the ridge and furrow and settlement core.
- There is an opportunity to utilise existing views towards the Broad Town White Horse Monument from within the north-western corner of the eastern part of the site as a feature of the development scheme.
- Opportunities exist to diversify the landscape features and increase the functionality of the land in accordance with sound GI principles. The riparian environment around Brinkworth Brook and the Wilts & Berks canal corridor should be protected and enhanced to the benefit of the environment. The presence of flood zones 2 and 3 within the floodplain landscape could deliver an extensive and interlinking green corridor feature and linkages with the adjacent Morningside Meadows.



- There is the opportunity for the provision of new public routes to enable circular walking within the site and add to the variety and character of the walks that exist within the site already, including access to the Wilts & Berks canal and along Brinkworth Brook.
- There is the opportunity for the reinstatement of the canal, on its historic alignment, where it has been lost within the northern edge of the site.
- Development should be carefully considered on the higher slopes of the site to the south west which is visible from the wider landscape and should be avoided on the parcels to the east where the character of the land changes to a larger scale an 'open' nature, away from the settlement edge of Royal Wootton Bassett and at the interface with the wider undeveloped landscape to the east and south.

Conclusion

6.19. Overall, there is potential for the site to accommodate development provided an appropriate landscape strategy is followed. There is an opportunity to locate development parcels within a strong GI network which incorporates non-vehicular connectivity, riparian features and new trees, hedgerows and woodland. This provides the opportunity for enhanced linkages along the Wilts & Berks canal and with the adjacent Brynard's Hill Country Park to the north. It is recommended that development parcels are contained within this framework on the lower slopes of the western portion of the site to reduce visual effects and 'break up' built form from wider views. There are opportunities to incorporate heritage, arboricultural and ecological features within a consolidated scheme. This includes the provision of a new vista to the link the site with the settlement and St. Bartholomew's and All Saints Church tower local landmark within the western portion of the site. In addition, there is an opportunity to define new views towards the Broad Town White Horse Monument from within the north-western corner of the eastern part of the site, where it is currently visible in the distance, as a feature of the site. It is recommended that development parcels are located within the existing GI network with clusters of characteristic woodland planting to the south, west and east. This seeks to ensure a cohesive and connected scheme to the south of Royal Wootton Bassett.



Section 7: Conclusions

- 7.1. Taking all disciplines into account, no environmental issues that could affect the principle or quantum of development of the site have been identified. Those valuable features that exist at the site can be accommodated by the adoption of relatively simple design principles. In addition, there is potential to enhance the site in line with the objectives set out in the local plan.



Appendix 1: BS5837 Cascade Chart for Tree Quality Assessment



Appendix 1: BS5837 Cascade Chart for Tree Quality Assessment

TREES FOR REMOVAL				
Category and Definition	Criteria			Identification on Plan
<p>Category U</p> <p>Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years</p>	<p>Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category U trees (i.e. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning).</p> <p>Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline.</p> <p>Trees infected with pathogens of significance to the health and/or safety of other trees nearby or very low-quality trees suppressing adjacent trees of better quality.</p> <p>(NOTE: Category U trees can have existing or potential conservation value which it might be desirable to preserve)</p>			DARK RED
TREES TO BE CONSIDERED FOR RETENTION				
Category and Definition	Criteria - Subcategories			Identification on Plan
	1. Mainly Arboricultural Values	2. Mainly Landscape Values	3. Mainly Cultural Values, including Conservation	
<p>Category A</p> <p>Trees of high quality with an estimated remaining life expectancy of at least 40 years</p>	<p>Trees that are particularly good examples of their species, especially if rare or unusual; or those that are essential components of groups or formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)</p>	<p>Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features</p>	<p>Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)</p>	LIGHT GREEN



TREES TO BE CONSIDERED FOR RETENTION

<p>Category B Trees of moderate quality with an estimated remaining life expectancy of at least 20 years</p>	<p>Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remedial defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation.</p>	<p>Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality</p>	<p>Trees with material conservation or other cultural benefits.</p>	<p>MID BLUE</p>
<p>Category C Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm</p>	<p>Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories.</p>	<p>Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value; and/or trees offering low or temporary/transient landscape benefit.</p>	<p>Trees with no material conservation or other cultural value.</p>	<p>GREY</p>



Plans:

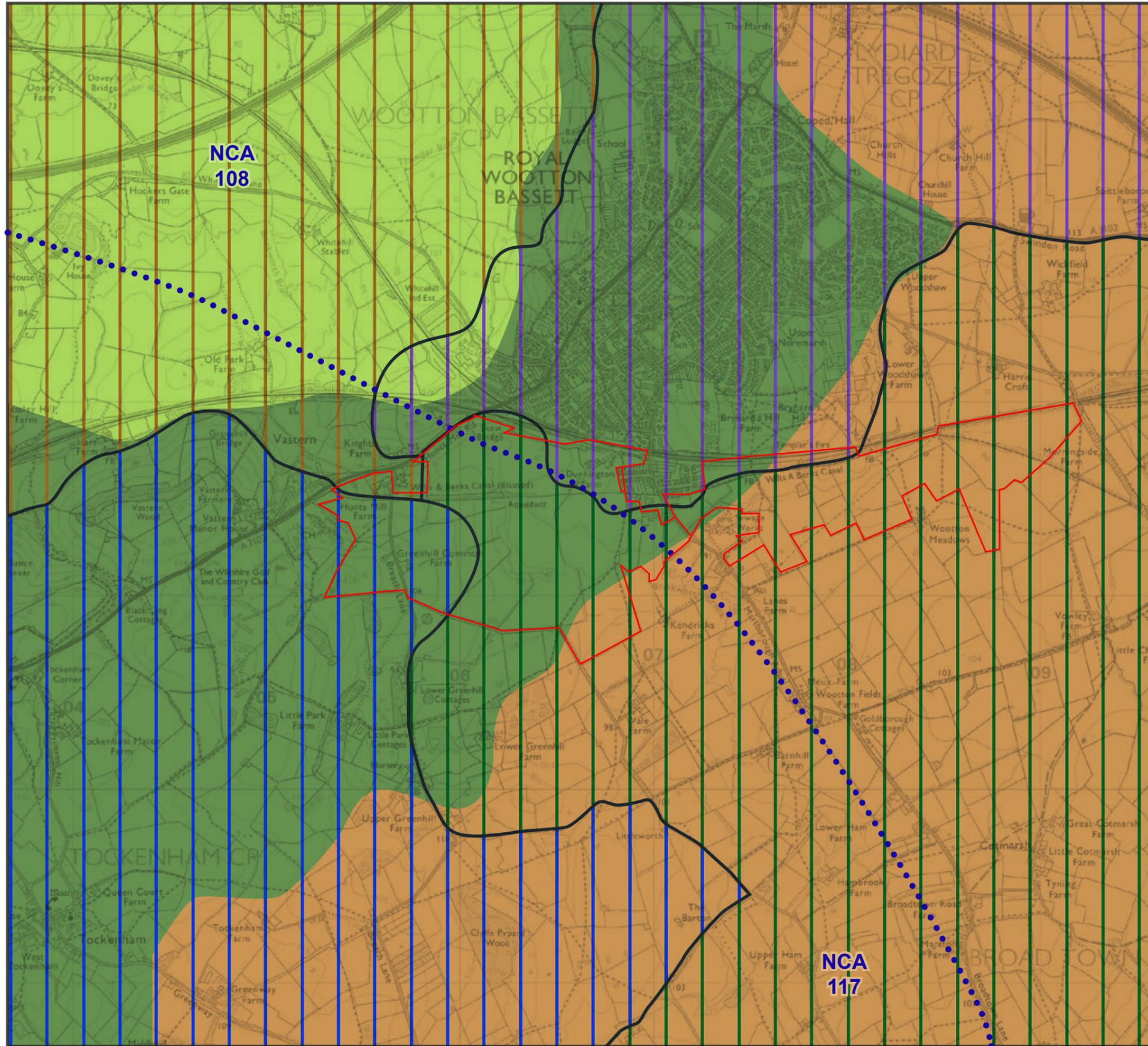
13750/P07: Landscape Character – National, County and District Context

13750/P08: Viewpoint Location Plan

13750/P09: Photosheets

13750/P12: Combined Opportunities and Constraints





 Site Boundary

National Character Areas

-  **NCA 108** Upper Thames Clay Vales
-  **NCA 117** Avon Vales

Wiltshire Landscape Character Assessment (2005)

-  LCT 8 Limestone Ridge (8A, Swindon - Lyneham Limestone Ridge)
-  LCT 11 Rolling Clay Lowland (11A, Calne Rolling Clay Lowland)
-  LCT 12 Open Clay Vale (12B, Avon Open Clay Vale)

North Wiltshire Landscape Character Assessment (2004)

-  LCT Urban Fringe Scarp (LCA 3, Swindon Fringe)
-  LCT Lowland Clay Farmland (LCA 14, Hillmarton Rolling Lowland)
-  LCT Settled Hill Farmland (LCA 13, Lyneham Hills)
-  LCT Lowland River Farmlands (LCA 11, Avon Valley Lowlands)

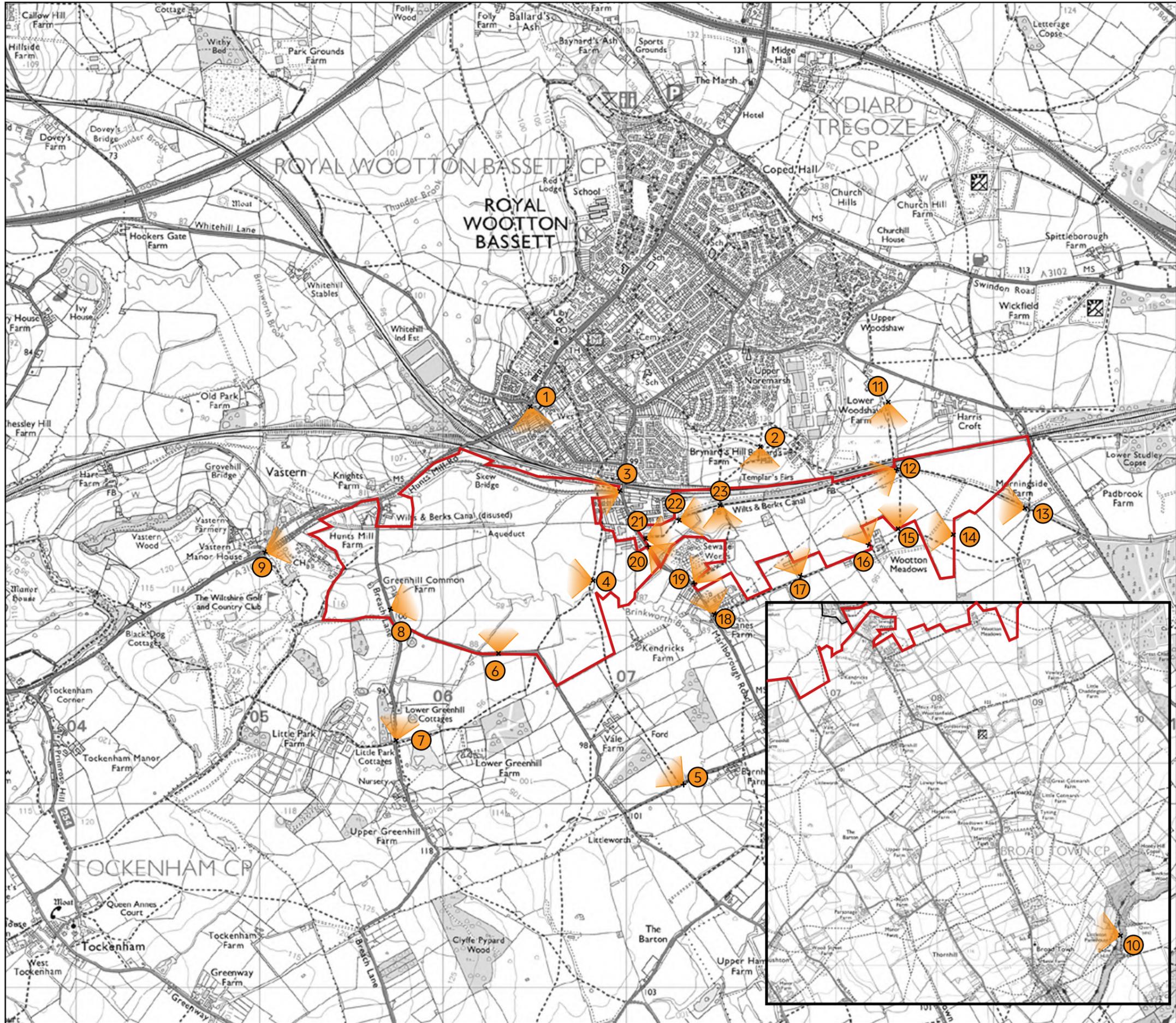
NOTE: Boundaries are based on maps within the Landscape Character Assessments and are indicative



Project Details	Land South of Royal Wootton Bassett
Title	Landscape Character - National, County and District Context
Scale	As shown (Approximate)
Drawing Ref	13750/P07
Date	March 2021
Checked	KP/AW



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-  Site Boundary
-  Viewpoints



Project Land to the South of Royal Wootton Bassett

Drawing Title **Viewpoint Location Plan**

Scale Not to Scale @ A3

Drawing No. 13750/P08

Date March 2021

Checked KP/AW





Photoviewpoint 1: Taken from A1302, north of site



Photoviewpoint 2: Taken from PRoW north of site at Brynard Hill Country Park



Photoviewpoint 3: Taken from Marlborough Road, northern site boundary



Photoviewpoint 4: Taken from Prow within eastern side of site



Photoviewpoint 5: Taken from Brinkworth Brook, south of site



Photoviewpoint 6: Taken from road east of Breach Lane, southern site boundary



Photoviewpoint 7: Taken from Road adjoining Breach Lane, south of site



Photoviewpoint 8: Taken from Breach Lane, within site boundary



Photoviewpoint 9: Taken from A3102, Hunts Mills Road, west of site



Photoviewpoint 10: Taken from Bincknoll Wood, south east of site beneath the Broad Town White Horse hill figure monument and from within the AONB



Photoviewpoint 11: Taken from PRow north east of site



Photoviewpoint 12: Taken from PRow within site boundary, located north east within the site



Photoviewpoint 13: Taken from PRow located south-east of site



Photoviewpoint 14: Taken from site boundary south-east of site



Photoviewpoint 15: Taken from site boundary south east of site



Photoviewpoint 16: Taken from site boundary south east of site



Photoviewpoint 17: Taken from PRoW south-east of site



Photoviewpoint 18: Taken from Malborough Road south of site



Photoviewpoint 19: Taken from Malborough Road, adjacent to Sewage Works



Photoviewpoint 20: Taken from Malborough Road, on site boundary



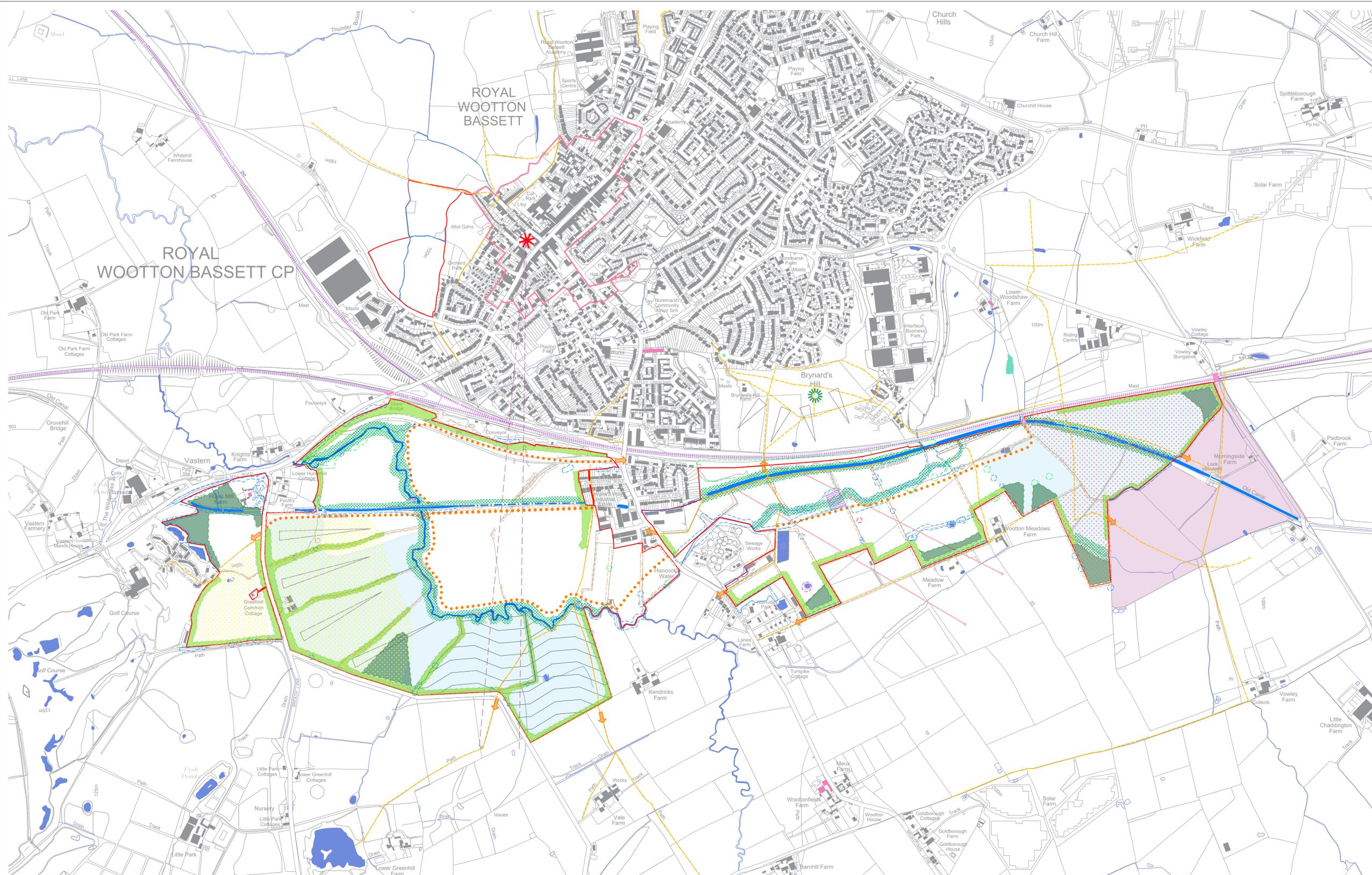
Photoviewpoint 21: Taken from PRow on site boundary



Photoviewpoint 22: Taken from ProW on site boundary



Photoviewpoint 23: Taken from PRoW on site



Key:

- Site Boundary
- Existing Public Right of Way to be Retained
- Existing Sloping Topography
- Existing Railway Line
- Existing Brinkworth Brook
- Existing Disused Wits and Berks Canal
- Potential for reinstatement of Wits and Berks canal historic alignment
- St. Bartholomew's and All Saints Church Tower (Landmark Visible in Long Distance Views)
- Brynards Hill Country Park
- Wootton Bassett Mud Springs SSSI
- Morningside Meadows WWT Reserve
- Ponds with Great Crested Newt Potential
- Existing Veteran Trees
- Existing Category A Trees
- Existing Category B Trees
- Existing Category C Trees
- Existing Category U Trees
- Agricultural Land Classification Grade 5b
- Scheduled Ancient Monument
- Ridge and Fallow
- Conservation Area
- Listed Buildings
- Existing Long Distance Views towards the Broad Town White Horse Monument

Landscape and Visual Recommendations

- Opportunity for new PROW routes to enable circular walking routes to add to the variety, character and duration of walks, including along the canal
- Facilitate non-vehicular connections to both the settlement to the north and wider landscape to the south and west
- Potential to define new vistas towards St. Bartholomew's Church from within the site potential for linkage between ridge and fallow land and settlement
- Enhancement of riparian features for ecological benefit utilising appropriate water tolerant plant species
- Opportunity for enhanced and new hedgerow to comprise a strong Green Infrastructure framework
- Opportunity for new woodland to comprise a strong Green Infrastructure framework
- Carefully consider development on the upper slopes where the site is visible in long distance views
- Avoid development within the eastern edge of the site where the character is more 'open' in nature and there is less connection with the existing settlement edge

Ecological Recommendations:

- Trees with low potential spread throughout the site. Further surveys will be required if they are to be affected by development.
- Wide buffers to be provided along Brinkworth Brook and the canal for their protection.
- Fill hedgerows and trees to be retained where possible. Use natural hedgerow gaps or field access points for new roads/footpaths.
- Hedgerows and treelines should be buffered to enable retention of wildlife connectivity.
- Potential on site for amphibians (inc common toad and great crested newt), badger, bats (roosting and activity), birds (wintering and breeding), dormouse, otter, reptiles and water vole. Further surveys will be required.
- Multi-functional green infrastructure to be included/enhanced along brook and canal line to compensate for habitat loss.
- Provide buffers of no development to the existing ponds which offer connections to other proposed and existing habitat.

Heritage Recommendations:

- Brick canal structure which could be stabilised / repaired.

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Combined Opportunities and Constraints Plan

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Landscape



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Arboriculture

RWB57



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A specialist team within DLP Planning Ltd

For and on behalf of
Royal Wootton Bassett Town Council

Wiltshire Local Plan Review Consultation

**Prepared by
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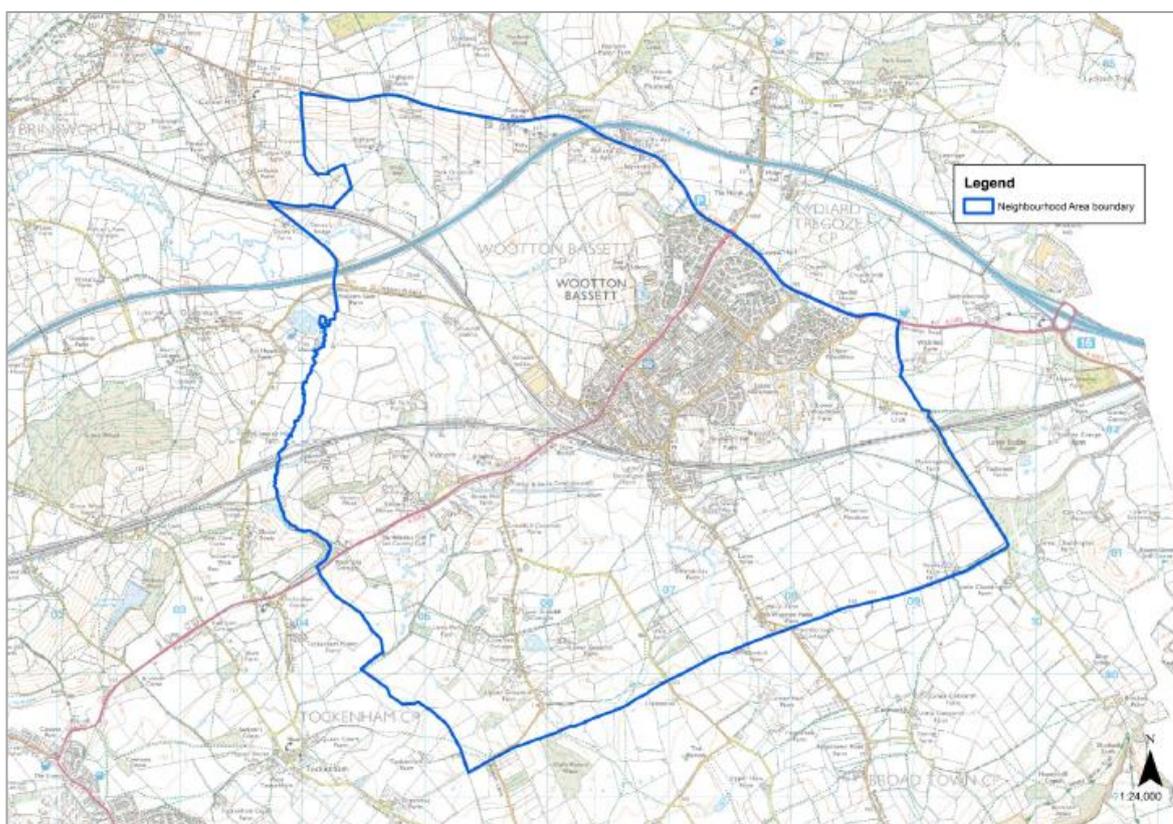
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1.0 INTRODUCTION

- 1.1 This representation to the Wiltshire Local Plan Review consultation has been prepared by DLP Planning Ltd on behalf of our client, Royal Wootton Bassett Town Council ('the Town Council').
- 1.2 The Town Council is currently undertaking a review of its Neighbourhood Plan, which covers the Parish of Royal Wootton Bassett, as shown in Figure 1 below. This area comprises the main town of Royal Wootton Bassett and a large expanse of surrounding countryside to the north west, west and south of the main urban area. At the last Census in 2011 this area had a population of 11,385 and just over 5,000 dwellings.

Figure 1. Royal Wootton Bassett Neighbourhood Plan Area



- 1.3 The first Neighbourhood Plan was adopted in April 2018. This Plan comprised 12 policies covering a range of development management issues and policy themes, including those relating to services and facilities, the town centre and retail, education, housing and development, and transport.
- 1.4 As noted above, the Town Council is currently undertaking a review of its Neighbourhood Plan. This is in the initial stages of development. A public consultation exercise was undertaken in October-November 2020 to identify key issues and objectives for the revised plan. The stage which is currently being undertaken is a policy scoping exercise, in order to determine what the vision and objectives for the Plan will be and what broad range of policies will be included. As the timescales for preparing the Neighbourhood Plan Review align with those of Local Plan Review it is therefore important that close working between the Town Council and Wiltshire Council is established for plan-making in Royal Wootton Bassett.
- 1.5 The following sections of this report comment on the contents of the relevant consultation documents, including the Emerging Spatial Strategy, the documents relating specifically to Planning for Royal Wootton Bassett (including proposed development locations), and other

relevant supporting evidence-base documents. These representations have been prepared in the context of supporting the Town Council's interests in preparing and delivering the Neighbourhood Plan Review, and the possibility that the Town Council may choose to allocate non-strategic sites for specific land uses within the Neighbourhood Plan.

- 1.6 In submitting these representations, we wish to be kept informed about future stages of the Wiltshire Local Plan Review and work closely with the Council in the preparation of strategic policies covering Royal Wootton Bassett.

2.0 EMERGING SPATIAL STRATEGY

2.1 Each of the sections below relates to the relevant section contained in the 'Wiltshire Local Plan Emerging Spatial Strategy' (January 2021) document.

a) Introduction

2.2 The Town Council acknowledges and supports the need to deliver housing in Wiltshire to meet the identified housing needs of the current and future population of the county, as evidenced in the Local Housing Needs Assessment, together with additional employment land which may be required to help meet the needs of growing local businesses and provide job opportunities for local residents. However, in meeting these identified needs the Town Council is keen to ensure that Wiltshire Council, in developing its Strategy for Growth, ensures that future development represents a *sustainable pattern of growth* and that any proposed new development is supported by *appropriate infrastructure provision* required to support the levels of growth identified.

2.3 The Town Council supports the strategy of primarily focusing new development within the existing settlements, as this will enable sustainable patterns of growth (in line with National Planning Policy Framework (NPPF) paragraph 7) by ensuring that residents of new developments are best able to access services, community facilities and other infrastructure. The Town Council also supports the suggestion outlined in paragraph 1.3 of the Emerging Spatial Strategy that *"Outside of the main settlements, the focus will continue to be on protecting the countryside and only development that can meet local needs"*. The Town Council wishes to ensure that the countryside around Royal Wootton Bassett is protected from unnecessary urban sprawl, particularly to the east of the town in order to prevent reduction of the gap between Royal Wootton Bassett and Swindon. On this point, the Town Council would support the inclusion of a strategic countryside gap policy in the Local Plan in order to preserve the separation between Royal Wootton Bassett and Swindon. Any growth proposed in Royal Wootton Bassett must be demonstrated to meet the current and projected future needs of Royal Wootton Bassett rather than meeting the needs of Swindon.

2.4 The Town Council supports the proposed retention of the existing settlement hierarchy, as defined in the Core Strategy (Core Policy 1: Settlement Strategy), including the identification of Royal Wootton Bassett as a Market Town. The suggestion that Market Towns have *"the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities and promote self-containment and sustainable communities"* (Emerging Spatial Strategy, page 3) would only be supported where it can be demonstrated that the level of development proposed meets an identified local need and where growth is accompanied by appropriate contributions towards required infrastructure provision (including highways and transport infrastructure, and education, health and other community facilities). The Town Council is keen to ensure that any future growth that is allocated in the Market Towns, including Royal Wootton Bassett will help to meet an existing identified housing need in a sustainable manner, in locations that enable good access to services and facilities. It is unlikely that the allocation of 'significant' levels of development in the town would be supported unless this is accompanied by the necessary infrastructure provision including, amongst others, the delivery of a bypass to the south of the town.

2.5 The Town Council supports the promotion of 'self-containment and sustainable communities' within Wiltshire's Market Towns, including Royal Wootton Bassett, but notes that this will only be achieved through proportionate levels of development that are supported by necessary levels of infrastructure and service provision.

b) Growth and Climate Change

2.6 The Town Council supports the ambition to address the issue of climate change through the

promotion of sustainable patterns of development, including by focusing the majority of growth within Wiltshire's three main settlements (Chippenham, Salisbury and Trowbridge). The Town Council also encourages Wiltshire Council to consider the role of small and infill sites within existing settlement boundaries to accommodate residential development as a first option. Such forms of development would promote self-containment within existing settlements, provide easy access to existing services and facilities, and represent the most sustainable pattern of growth. The potential of smaller sites located within the existing built up area of settlements (including Royal Wootton Bassett) to accommodate growth should be prioritised before large-scale expansion of these settlements into the open countryside is considered. The Neighbourhood Plan has the potential to play a key role in identifying and allocating these sites within Royal Wootton Bassett.

c) Delivering the Spatial Strategy

- 2.7 The Town Council supports the Council's ambition to maximise levels of development within existing settlements in order to minimise expansion into the surrounding countryside. The Town Council also supports the need to encourage walking and enhancing access to recreation facilities and opportunities for exercise; an issue which has been emphasised through the impact of the Covid-19 pandemic and the shift towards increased home working. Ensuring that new development is sustainably located, within walking distance of key services, recreation and leisure facilities, will be increasingly important as we adapt to 'new ways of working'.
- 2.8 Whilst Covid-19 has also led to a rise in online retailing and the changing nature of town centre, the Town Council believes that the role of town centres and High Streets as a place for providing independent retailing, restaurants, cultural and leisure facilities should continue to be supported as far as possible through the Local Plan. An increase in home working and reduced out-commuting is likely to result in increased demand for local services and facilities, including within the centres and High Streets of Wiltshire's Market Towns, such as Royal Wootton Bassett.
- 2.9 The Town Council supports Wiltshire Council's recognition of the need for closer working between the Council and Parish and Town Councils to support the preparation of neighbourhood plans (as outlined in paragraph 2.10 of the Emerging Spatial Strategy document. This closer collaboration is welcomed by the Town Council, as they continue to progress their Neighbourhood Plan Review. In respect of the identified 'place shaping priorities', the Town Council however requests that these are closely aligned to the Vision and Objectives that are currently being developed for the Royal Wootton Bassett Neighbourhood Plan and which were derived from a comprehensive consultation exercise which was recently undertaken. Further comments on the proposed 'place shaping priorities' are presented in section 3 of this report.
- 2.10 The Town Council supports the Council's ambition to ensure that land for development is allocated on sites that are deliverable. In identifying suitable and deliverable sites for development, the Council must also ensure that the Local Plan allocates a range of small and medium-sized sites, in addition to large strategic sites), in accordance with paragraph 68 of the NPPF. The option for allocating small- and medium-sized sites should be given to Neighbourhood Plans, such as the Neighbourhood Plan Review that is currently being prepared for Royal Wootton Bassett. Where Neighbourhood Plans choose not to allocate sites, the allocation of small and medium-sized sites should be included within the Local Plan to ensure that a range of sizes of allocations (not just large scale strategic sites) are identified.
- 2.11 Paragraph 2.11 of the 'Emerging Spatial Strategy' document states:

"The Local Plan Review is required to set housing requirements for the plan period for each main settlement's area designation for neighbourhood planning. As land

within main settlements is mostly built up, a requirement translates to a brownfield target. A target helps to maximise these opportunities and can reduce pressures to build on greenfield land.”

- 2.12 Whilst the Town Council supports the prioritisation of brownfield land for development, the Town Council objects to the Neighbourhood Plan only being given a housing target for allocating brownfield sites. National Planning Practice Guidance (paragraph ref. 41-009-20190509) states that “**Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement**” (emphasis added). Therefore, the housing requirement figure for Neighbourhood Plans should be provided in the context of the Local Plan’s local housing requirement, not based on the brownfield site capacity of neighbourhood plan areas.
- 2.13 Paragraph 2.11 above states that “**As land within main settlements is mostly built up, a requirement translates to a brownfield target**” (emphasis added). However, this is not always the case. As Figure 1 above illustrates, the Royal Wootton Bassett Neighbourhood Plan area also covers a large area of greenfield land. The Town Council, as neighbourhood planning body, should have the ability to allocate sites anywhere within their Neighbourhood Area so long it is demonstrated that they are suitable, available and deliverable and consistent with the overarching spatial strategy for growth. This point is addressed in further detail in section (d) below.
- 2.14 As the focus of growth for the emerging Local Plan is within the ‘main settlements’, including the Market Town of Royal Wootton Bassett, the Town Council would therefore welcome further engagement with Wiltshire Council on the development of their Neighbourhood Plan to ensure that its relationship with the Local Plan is recognised as the Local Plan is further developed.

d) Emerging Spatial Strategy

- 2.15 The Town Council acknowledges the principle of focusing the majority of growth in the County’s three Principal Settlements (Chippenham, Salisbury and Trowbridge).
- 2.16 In paragraph 3.4, the Council states that sites in Market Towns may be selected by local communities if they are progressing or reviewing a neighbourhood plan. **The Town Council supports this and wishes to engage with the local planning authority further on which of the identified ‘reasonable alternative’ sites would be most suited for development, and which, if any of these sites could be delivered through the Neighbourhood Plan.**
- 2.17 The Town Council supports the allocation of targets for neighbourhood plans to deliver within each settlement. However, this should be a target based on the housing required within the neighbourhood plan area rather than a ‘brownfield land target’ (as stated in National Planning Practice Guidance, paragraph 41-009-20190509). This approach is therefore not robust and is unlikely to be considered sound at examination. There is also no basis in the NPPF for this ‘target’ to be restricted to brownfield land only.
- 2.18 Furthermore, these brownfield land target figures are derived from the windfall allowance identified in the Wiltshire housing land supply, however windfall sites may be delivered on either brownfield or greenfield sites, and by virtue of their ‘windfall’ nature such sites cannot be planned for. And whilst the Town Council and the NPPF supports re-use of brownfield land, the key objective (set out in paragraph 68) is for local planning authorities to promote the development of a good mix of sizes of sites, including small and medium sized sites. The Local Plan Spatial Strategy does not, at present, sufficiently support the delivery of small and medium sized sites. The Town Council therefore suggests that the target given to neighbourhood plan groups is not restricted to just brownfield sites, but is a target to enable the development of small- and medium-scale developments on any suitable sites within or adjacent to existing settlements in the neighbourhood plan area. It may be, for example, that

there are greenfield sites within a neighbourhood plan area that are considered suitable for development and would be preferable to development of other 'brownfield' sites, but which could not currently be allocated under the restrictive 'brownfield only' target. The spirit in which neighbourhood planning was introduced was to give local communities the freedom to allocate any suitable sites within their neighbourhood area for development, without being restricted to which sites these could be. The current 'brownfield target' is overly restrictive and does not reflect the purpose of neighbourhood planning, and as such is contrary to the NPPF.

- 2.19 Paragraph 13 of the NPPF states that "*Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should **shape and direct development that is outside of these strategic policies***" (emphasis added). The NPPF does not state that this development should only be directed to previously developed or brownfield sites only. The proposed 'brownfield target' for neighbourhood areas is therefore overly restrictive and inconsistent with national policy. If a housing target is to be set for individual settlements, this should be termed a 'non-strategic sites target' not a 'brownfield target'.
- 2.20 Neighbourhood plan groups should have the ability to assess and make judgments about which sites within their neighbourhood areas are most suitable for development themselves, rather than being restricted to allocating only brownfield sites.

e) Swindon Housing Market Area

- 2.21 The Town Council acknowledges the Council's identified preferred Option B, which involves a focus of growth on Royal Wootton Bassett. The levels of growth proposed in Royal Wootton Bassett under this option would appear to result in significant issues relating to local education and health service capacity and managing traffic both within the town and at junction 16 of the M4 (paragraph 3.68). In light of these identified issues, the Town Council questions the sustainability and feasibility of the growth option identified. In delivering this option, the Local Plan would need to have mechanisms in place to ensure that these issues are adequately addressed.
- 2.22 The Town Council supports the recognition in paragraph 3.75 of the 'Emerging Spatial Strategy' document that the Royal Wootton Bassett Neighbourhood Plan will "*play an important part in meeting local needs from growth*". **The Town Council requests the opportunity to engage further with Wiltshire Council on this matter and how sites may potentially be allocated within the Neighbourhood Plan.**
- 2.23 In terms of the scale of growth identified for Royal Wootton Bassett, the Town Council notes the residual housing requirement figure of 990 identified at 1st April 2019. Before the any housing sites are identified and the Local Plan is published for pre-submission (Regulation 19) consultation, this figure should be revised to provide the most up-to-date residual figure (i.e. the residual requirement at 1st April 2021) in order to take account of any housing completions and commitments that have come forward in the town in the past two years.
- 2.24 As noted above, the 'brownfield target' should be replaced with a housing requirement target for the Neighbourhood Plan Area. Wiltshire Council should also acknowledge the potential role of the Royal Wootton Bassett Neighbourhood Plan Review (currently underway) in identifying housing allocations (particularly on non-strategic sites).

f) Appendix One: The Role and Function of Brownfield Targets

- 2.25 As outlined in section (d) above, the Town Council objects to the use of 'brownfield targets' as these undermine the purpose of neighbourhood plans, which is to provide local communities with the ability to allocate non-strategic sites anywhere within their neighbourhood areas so long as these align with national and local strategic policies. By

limiting neighbourhood plans to allocating land only on brownfield sites, this removes some of their function and is contrary to national policy.

- 2.26 In addition, paragraph 21 of the NPPF states that “*Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies*”. This includes the allocation of non-strategic sites. The Local Plan should not therefore seek to determine where and in what locations these non-strategic sites should be allocated, if they can be delivered through a Neighbourhood development Plan.
- 2.27 Paragraph 6 of Appendix One states that “*The brownfield targets set out in the Local Plan will be the basis for housing requirements for designated neighbourhood areas at main settlements*”. This does not align with paragraph 65 of the NPPF which states that “*strategic policies should also set out a housing requirement for neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations*” (emphasis added). The NPPF does not therefore state that the neighbourhood area housing requirement provided by the local planning authority should dictate on which specific sites housing should be allocated, only in which broad settlement locations growth is required and what levels of growth are required in these locations.
- 2.28 Furthermore, the housing requirement for designated neighbourhood areas should be a proportion of the overall housing requirement for the plan that is required within a particular neighbourhood area. Paragraph 5 of Appendix One states that “*A settlement’s brownfield target represents the total number of additional new homes the Council estimate can be built on previously development land over the next 10 years (2021-2031), not the whole plan period*”. This does not align with the NPPF. The Local Plan should identify a housing requirement for each neighbourhood area for the whole plan period (i.e. to 2036), not just the next 10 years.
- 2.29 Paragraph 9 of Appendix One recognises that “*It is...by the nature of brownfield land opportunities, uncertain whether a target can be achieved; or indeed whether circumstances at a settlement have fundamentally changed*”. Therefore it is clear that brownfield targets may not themselves be sufficient to meet the housing requirements identified within a neighbourhood area, and therefore it is more appropriate for a housing requirement figure to be provided to neighbourhood plan groups so that they can themselves determine how best to ensure that a deliverable supply of land is allocated to meet identified housing needs, rather than depending on delivery of brownfield sites, which Wiltshire Council acknowledges may not by themselves be a reliable source of housing supply.
- 2.30 Paragraph 13 of Appendix One states “*Some neighbourhood plans are being prepared or reviewed in parallel to the Local Plan Review. They can identify **brownfield sites** that will be included in developable land supply. A corresponding amount of land can then be removed from that remaining to be planned for and the Local Plan can reduce the amount of greenfield land it needs to allocate for new homes*” (emphasis added). The Town Council objects to the reference here to ‘brownfield sites’, as national policy dictates that neighbourhood plans can identify any sites for development, not just brownfield sites.
- 2.31 Paragraph 14 of Appendix One states that brownfield targets have been calculated from the Council’s ‘windfall’ allowance which itself is calculated from historic brownfield permissions (previously developed sites not allocated in the development plan). As previously stated, the housing target provided to neighbourhood plan areas should be based on the ‘*housing requirement*’ in each area, as derived from the Local Plan housing requirement figure (as required by NPPF paragraph 65) rather than based on historic windfall consents. It should be derived from an assessment of *housing need* rather than based on trends of brownfield sites that have been delivered in that area in the past. The approach currently proposed is not robust and is unlikely to be found sound at examination.

- 2.32 Notwithstanding the fact that neighbourhood plans should not be limited to allocating sites on brownfield land and that housing targets for neighbourhood areas should be based on an assessment of housing need, the Council's calculation of a brownfield target based on carrying forward historic brownfield site permissions within each settlement and considering this to be "*a realistic estimate of future brownfield opportunities*" is not robust. This is because there is a finite number of brownfield sites available within a settlement at any one time, and so it is unlikely to be possible to allocate sufficient sites to meet the identified 'brownfield target' on brownfield sites at the current time. The nature of windfall sites is that they come forward as 'windfall' rather than being planned. Any 'target' provided to neighbourhood groups should instead be based on an identified housing requirement that can be appropriately planned for to provide a robust and deliverable supply of housing sites that can meet identified local needs.

3.0 PLANNING FOR ROYAL WOOTTON BASSETT

3.1 Each of the sections below relates to the relevant section contained in the 'Wiltshire Local Plan Planning for Royal Wootton Bassett' document.

a) Scale of Growth

3.2 The Town Council supports the need to deliver new homes through both the Local Plan and neighbourhood plan, as appropriate, in order to meet local housing needs. However, the Town Council believes that the Local Plan should not just focus on delivery of strategic and large or complex sites but should ensure that it also allocates sufficient small- and medium-sized sites, in accordance with paragraph 68 of the NPPF.

3.3 As stated in our response to the 'Emerging Spatial Strategy' outlined in section 2 above, the Town Council objects to the identification of a brownfield target. The identification of a brownfield target is not in accordance with the NPPF, which requires neighbourhood areas to be given a 'housing requirement' figure. This target is also based on historic windfall delivery and it may not be possible to allocate sufficient deliverable brownfield sites to meet this need at the present time.

3.4 In addition, the residual housing requirement figure for Royal Wootton Bassett should be updated to the latest figure at the time the Regulation 19 version of the Local Plan is published (likely to be 1st April 2021) to ensure that the requirement figure takes account of any recent completions or commitments.

3.5 The Town Council notes that Paragraph 13 of the 'Planning for Royal Wootton Bassett' document states:

"Royal Wootton Bassett Town Council would support higher level of growth than what is proposed, provided this enables delivery of capacity improvements to transport, education and health infrastructure, ideally by way of a strategic development. However, amongst other issues, fundamental concerns remain regarding the capacity of M4 Junction 16. Due to the complexities linked with higher growth such strategic development would have to be steered by the Local Plan".

3.6 The Town Council will only support a higher level of growth where it can be assured that the infrastructure improvements needed to support this level of growth are delivered as part of the proposed development.

3.7 The Town Council welcomes the statement in Paragraph 14 of the document that Wiltshire Council will seek to align the Local Plan with the Neighbourhood Plan vision. The Neighbourhood Plan may choose to allocate sites for development, but this has not yet been decided. The Town Council would welcome further engagement with Wiltshire Council on this matter.

b) Place Shaping Priorities

3.8 The Town Council broadly supports the draft priorities for Royal Wootton Bassett identified by Wiltshire Council, including the need to address climate change and achieve carbon reduction. In addition to those priorities listed, the Town Council would also like to add the following additional priorities which emerged from the recent initial public consultation on the Neighbourhood Plan Review:

- Infrastructure improvements to reduce congestion in the town centre, including investigating the feasibility of a bypass to the south of the town
- Retain and enhance green spaces within the town, including provision of a new town park (to the north west of the town incorporating the Row-de-Dow footpath) and country park (around Brynards Hill to the south of the town)

- Provision of additional cycle links, including along the restored canal route

3.9 In respect of draft Priority (i) the Town Council requests that this is reworded as follows to ensure that Royal Wootton Bassett continues to remain physically distinct from Swindon and to prevent the settlements from merging in the future:

“Protecting the distinct character and identity of the town, recognising its proximity to Swindon whilst retaining its physical separation”

c) Potential Development Sites

3.10 As noted above, in identifying sites to allocate within the Local Plan, the Council should ensure it does not allocate more land than is required to meet the identified housing need in Royal Wootton Bassett.

3.11 Any development that is allocated within the Local Plan should include a requirement to deliver *all* necessary infrastructure needed to support that development, including highways, education, health, leisure, and open space provision. Any allocations should also not have any adverse impacts on designated environmental sites or heritage assets.

3.12 The Town Council welcomes the opportunity to allocate sites within the Neighbourhood Plan, which is currently being reviewed. At present, the Town Council has not made any firm decision on whether the revised Neighbourhood Plan will include any site allocations. The Town Council would welcome further engagement with Wiltshire Council on this matter. It may be that a number of the potential development sites identified for the Local Plan may be suitable for inclusion as site allocations within the Neighbourhood Plan.

3.13 With respect to the ‘pool of sites’ identified within the ‘Planning for Royal Wootton Bassett’ document, the Town Council:

- Does not support the allocation of **Site 1 (Land at Marsh Farm)** due to site specific concerns and this is not the preferred strategic direction of growth for the town due to the potential for narrowing the gap between Swindon and Royal Wootton Bassett;
- Does not support the allocation of **Site 2 (Land at Midge Farm)** due to site specific concerns and this is not the preferred strategic direction of growth for the town due to the potential for narrowing the gap between Swindon and Royal Wootton Bassett;
- In principle supports the allocation of **Site 3 (Land at Maple Drive)** subject to ensuring there is no encroachment on the lake/nature reserve sites to north of site;
- Does not support the allocation of **Site 4 (Land at Whitehill Lane)** due to concerns regarding highways safety impacts (given the close proximity to an existing junior school) and development of this site would result in an unacceptable encroachment into the surrounding countryside;
- Would in principle support the allocation of **Site 5 (Land South of Wootton Bassett)** in preference to Site 7 (Land South of Wootton Bassett A & B) if a large scale strategic allocation at the town is required. However, this would need to be supported by evidence of housing need for a development of this scale and would need to be subject to comprehensive design and infrastructure improvements (including bypass) being delivered;
- In principle supports the allocation of **Site 6 (Land South of Templar’s Way)** for employment use;
- Does not support the allocation of **Site 7 (Land South of Wootton Bassett A & B)**, as Site 5 (Land South of Wootton Bassett) would be the preferred location for a large scale strategic development;
- Does not support the allocation of **Site 8 (Land at Woodshaw)** due to site specific concerns and this is not the preferred strategic direction of growth for the town due to

the potential for narrowing the gap between Swindon and Royal Wootton Bassett.

d) Settlement Profile

- 3.14 The Town Council broadly supports the infrastructure requirements identified by Wiltshire Council. Based on priorities that are emerging from the ongoing Neighbourhood Plan Review, the following items should also be added to the list of infrastructure requirements:
- The delivery of a country park to the south of the town (currently a requirement of the S106 agreement for the consented Brynards Hill development);
 - The delivery of a town park to the west of the town, incorporating the Row-de-Dow footpath;
 - The delivery of new cycle routes and footpaths, including along the restored canal; and
 - The delivery of new recreational facilities for young people.
- 3.15 It is essential that any development sites that are allocated within the Local Plan include a requirement to deliver the required supporting infrastructure, including highways, education, health, sports and open space provision.

4.0 ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN

- 4.1 The Town Council supports the Council's ambitions to make Wiltshire carbon neutral by 2030 and to take steps to tackle climate change through the Local Plan. Sites which are allocated for development should be sustainably located, have access to services, amenities and public transport, and encourage the use of active travel modes.
- 4.2 In Royal Wootton Bassett, a bypass to the south of the town would help to reduce congestion and air pollution in the town centre caused by the build-up of stationary traffic. The Local Plan should also provide support for a restored canal link / cycle route between Royal Wootton Bassett and Swindon as a sustainable transport connection between the two settlements.

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**RTPI**

Chartered Town Planner



RWB59

Market Town Consultation Response Form

Ref:

(For official use only)

A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council by Tuesday 9th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title	█	
First name	██████	
Last name	██████	
Job title (where relevant)	Planning Director	
Organisation (where relevant)	Gleeson Strategic Land Ltd	
Address Line 1	Sentinel House	
Address Line 2	Harvest Crescent	
Address Line 3	Ancells Business Park	
Address Line 4	Fleet, Hampshire	

Postcode	GU51 2UZ	
Telephone Number	██████████	
Email Address	██████████	

Section Two – Questions

Which Market Town does your response relate to?

Answer:

Royal Wootton Bassett

1. What do you think to the scale of growth? Should there be a brownfield target? Should it be higher or lower?

Answer:

Royal Wootton Bassett is an established and popular market town which is attractive both as a place to live and as a location for employment. The emerging spatial strategy and the Assessment of the Alternative Development Strategies recognise that growth at Royal Wootton Bassett is the clear preferred alternative. As such, the council should consider the potential for more growth than proposed, if it could help to deliver infrastructure improvements where needs have been identified such as medical or educational facilities. Appropriate growth would also help to improve affordability ratios and ensure sufficient market and affordable housing is being delivered for future generations, particularly young people that wish to stay in the Town. Given the nature of the Town, it would not be appropriate to set a brownfield target as there is no clear evidence that any reliance can be placed on delivery from this source.

Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

Maintaining the vitality and viability of the town centre should be acknowledged as it plays an important role in supporting the town, local residents and employers. Allowing sustainable and proportionate growth of Royal Wootton Bassett will help to support the local economy which is likely to be more important in a post Covid world.

3. Is this the right pool of potential development sites?

Are there any other sites we should be considering?

Answer:

This is the right pool of development sites with the addition of land to the east of Site 2 Land at Midge Farm (SHELAA Ref: 3366). Gleeson Strategic Land is promoting ‘Land to the North of Swindon Road’ (see red line plan attached) which is the field adjacent to Site 3366 to the east. Indeed, the western half of this site is included within Site 3366 and it is therefore sensible to include all of it in the assessment of Site 2 as a development option and could deliver circa 135 new homes. The inclusion of this site would logically complete the frontage along Swindon Road from the roundabout junction with the B4042 up to the Churchill PH. It would be appreciated if the council could note this amendment to Site 2 and redraw the boundary.

4. What land do you think is the most appropriate upon which to build?

What type and form of development should be brought forward at the town?

Answer:

Site 2, with the addition of all of the field adjacent to the east, is the most logical and sustainable location for growth. This is the most readily accessible of the growth options, set on a principal transport route (A3102) with direct links to the M4 that would largely avoid the need for traffic to pass through the Town Centre. It is on a principal bus route with regular services to Swindon and just over 0.5 mile walk to the many shops and services in the town centre. Any potential for ongoing growth to the north is naturally curtailed by the M4 and land uses can be located so as to respect landscape and heritage issues and to ensure sensitive receptors are not close to the motorway or A3102.

Answer:

6. Are there any issues or infrastructure requirements that should be identified?

Other than that already identified within the 'Planning for' document?

Answer:

If you have any further comments you wish to make, please detail them below.

Please note that the western half of the site, Land North of Swindon Road, currently falls within Site 2. Just to be clear, all of this land is available for development and should therefore be considered as part of this growth option. Gleeson Strategic Land will be promoting the site through the Local Plan Review. See title plans appended as the land goes across two titles.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:



Date:

09/03/21

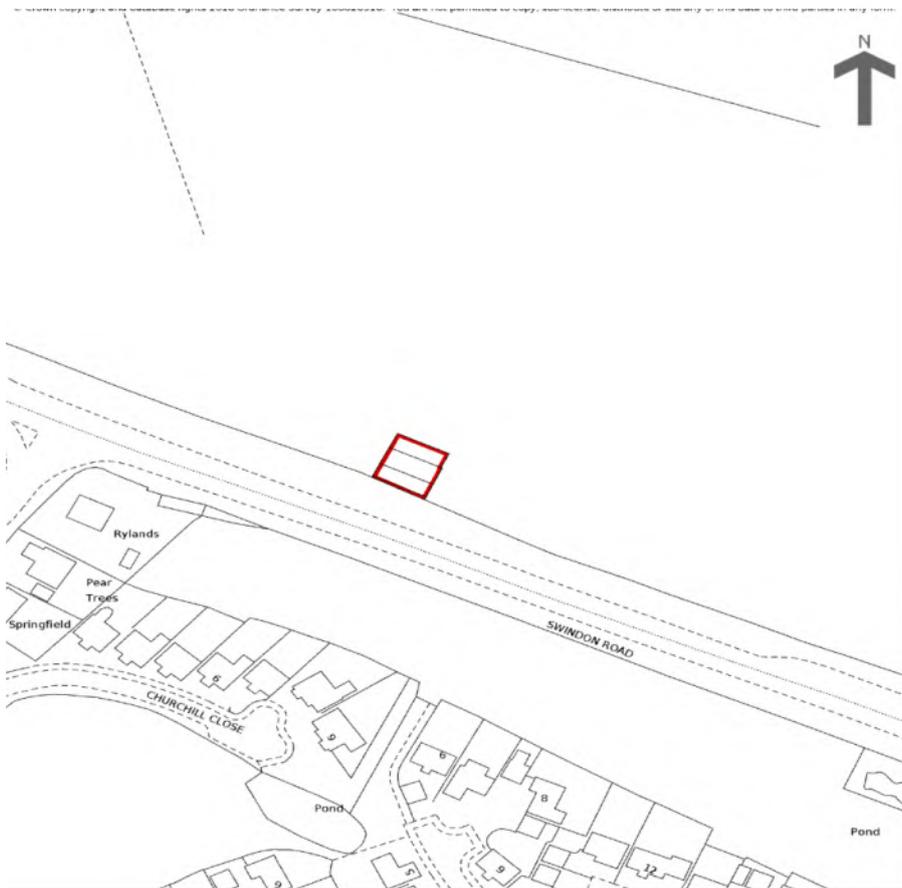
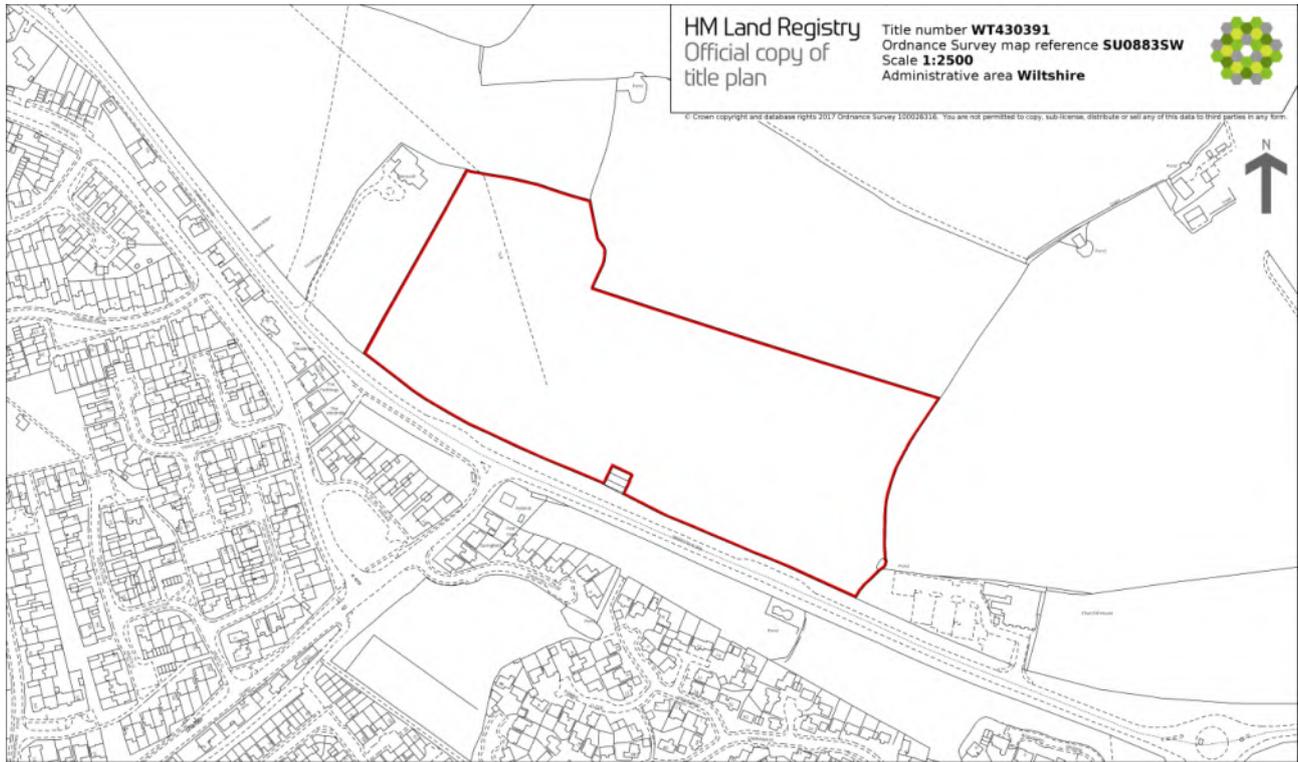
Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Appendix 1

Land north of Swindon Road, Royal Wootton Bassett



RWB60

██████████
Spatial Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JD

Our ref: WX/2009/110257/CS-13/IS1-L01
Your ref: Local Plan Review
Date: 09 March 2021

Dear ██████████

Local Plan Review

Thank you for consulting the Environment Agency on the Wiltshire Local Plan Review. We will respond separately to the Gypsies and Travellers DPD. We provide advice by topic headings, followed by a list of proposed development sites that raise concern for us.

Climate Change

We are pleased to see this issue has been given its own document. This demonstrates a commitment to your Council's declaration of a Climate Emergency and acknowledges it as the all-encompassing issue that it is.

Water Sensitive Urban Design

We would encourage you to familiarise yourself with the concept of Water Sensitive Urban Design (WSUD). This concept should be woven throughout the whole Local Plan and includes elements of each of the below topic headings (although it is not limited to these). The following CIRIA guidance document provides useful information on the concept and how to apply it in urban planning - [wsud_ideas_book.pdf \(susdrain.org\)](http://wsud_ideas_book.pdf(susdrain.org))

Flood Risk

Strategic Flood Risk Assessment (SFRA)

Whilst we are satisfied that the overall proposals accord with the principles in the NPPF, we would remind you of the need to undertake the Sequential Test for all the proposed site allocations against the flood risk criteria identified in the Wiltshire SFRA Level 1, i.e. all sources of flooding.

We note that many of the sites presented include areas of flood zone 1, 2 and 3, therefore implying that the Sequential Approach will be used in designing site layout.

Environment Agency
Rivers House, Sunrise Business Park, Higher Shaftesbury Road,, Blandford, Dorset, DT11 8ST.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

We encourage you to be explicit about this in the policy text to ensure readers understand this.

We would highlight that the SFRA Level 1 has not undertaken further detailed flood modelling to establish the climate change extents over the development's lifetime for these allocations that include flood zones. Therefore, we would recommend that SFRA Level 2 is considered for the large strategic allocations which are in proximity to flood zones 2 and 3. This would offer an increased level of certainty over the developable area and consider all sources of flood risk including climate change.

Given the uncertainties above, and in the absence of SFRA Level 2s, we would advise for those sites where there is a current flood risk shown within the potential development boundary that the housing numbers are stated as 'up to xxxx dwellings'. This then allows for any associated changes in updated flood data that may be produced with in a site specific flood risk assessment (FRA), or through updated river modelling by the Environment Agency. This is especially important as the amount of developable area could significantly reduce if climate change flood maps are produced, and show significantly larger flood outlines to our currently published flood map for planning.

Flood Risk Policy

We would recommend that any final flood risk policy does more than replicate national planning policy. We would recommend that additional elements are included in any local flood risk policy. These approaches have been undertaken elsewhere in Wessex. Below are examples of some policy elements that should be included.

- *The Council will support the relocation of existing highly vulnerable development (such as park homes) and essential infrastructure on land at risk from flooding provided:*
 - *the existing development is lawful;*
 - *the site for relocation is at a lower flood risk ;*
 - *the size of any replacement buildings or the application site are not materially larger than the existing buildings or site;*
 - *the type, scale and location of the replacement development is consistent with relevant planning policies; and*
 - *the applicant provides for the suitable restoration of the existing site.*
- *Unless agreed with the Environment Agency, development will not be permitted within an 8 metre buffer around an existing flood alleviation scheme or main river.*
- *The council will support planning applications for new flood defence and flood management schemes providing they accord with the relevant planning policies.*

Infrastructure

Where the proposed development relies on the existing community facilities and infrastructure that is at risk of flooding, developers should be required to contribute (via Infrastructure DPD/CIL) towards securing these facilities over the lifetime of the development. This partnership funding approach is likely to be essential in development and growth being considered sustainable, and securing the benefits of the wider community.

We would suggest that infrastructure in the river corridor is identified when it is in proximity to new growth. This can then be integrated into the master planning of these strategic allocations to deliver the flood risk and environmental benefits required.

Blue/Green Infrastructure

We are pleased to see the climate emergency being linked to blue/green infrastructure. We look forward to reviewing and engaging in the emerging Blue/Green Infrastructure policy document when this is available, as this will provide a critical element of the Local Plan.

It is important that blue green infrastructure is considered as a connected network across the county, and beyond, to allow a significant and meaningful impact from this work. This will allow floodplains to be better connected and increase green spaces for people and wildlife.

Within those proposed development sites that have floodplain as part of their development boundary there is an opportunity to link up the proposed areas of country park to have a more significant environmental feature that deliver extensive environmental, wellbeing and economic benefits to the region.

Therefore, we would recommend that the main rivers in the county should be considered as part of linear country park / open space. This would provide the opportunity to join the growth in towns to other areas along river corridors. We acknowledge that it would need to be carefully designed and interests managed, but could offer significant alignment of environmental benefits (including flood risk). An example of this is on the lower reaches of the River Stour, which forms part of the BCP and Dorset Council areas, which is looking to establish a 20km linear area for multiple uses around the river corridor and floodplain.

Carbon Net Zero

The Blue/Green Infrastructure has a real opportunity to link with and deliver against Carbon Net Zero targets. The opportunity for carbon sequestration through wetlands, improved floodplain connection, wet woodlands, etc. should be considered within the approach for carbon net zero development. Our soils are one of the biggest carbon sinks available to reduce climate change therefore we suggest the concept of building soil depth and quality could be included in this section. The prevention of further soil depletion through runoff, at the very least, should be included. Sustainable land management practices will play a large role in this, including within any new country park areas, such as in Chippenham.

Other sources of flood risk

We would also highlight that the Lead Local Flood Authority should provide the relevant advice in regards to surface water and groundwater, as well as local knowledge on ordinary watercourse flood risk. In Core policy 67: flood risk of the adopted Wiltshire Core Strategy (Section 6.181) reference is made to a document called Sustainable Drainage Systems: an introduction, published by the Environment Agency. This document is now 18 years old. It would be better to refer to a more up-to-date document and also link it back to Water Sensitive Urban Design as this concept (document linked above) is more holistic and will achieve many more cross-cutting sustainable outcomes than SuDS alone.

Canals

If your local plan policy wishes to support the new canal connection, and use of the River Avon, in Melksham for this proposal you should consider the need to undertake a SFRA Level 2 for this infrastructure project. This scheme has potential for impacting on the community and therefore a SFRA Level 2 could assist in the integration of the navigational requirements and flood risk in the town.

Both Melksham and Royal Wootton Bassett have the historic lines of the Wiltshire and Berkshire canal running through some sites, we would advise that the River and Canal trust would need to comment on these sites as the flood risk associated with the old canal route will vary even within sites and may affect the potential location of housing and other development.

Natural Flood Management

We support the reference to natural flood management in the last bullet point of policy theme1. However, we would prefer the removal of the words 'where necessary' as we would argue that natural flood management is always necessary, as it is a holistic concept and is most effective when not limited to individual development sites. It links closely to Water Sensitive Urban Design as mentioned above, and to the preservation and building of soils (above).

Groundwater Protection

Source Protection Zones (SPZs)

When allocating new development sites we advise that new buildings are located outside SPZ1 – the zone of highest vulnerability to pollution. Where this is not possible only the least polluting activities should be allowed, for example public green spaces could be orientated in these locations. Policy 68 of the adopted Wiltshire Core Strategy (section 6.185) includes reference to protecting SPZs. We would encourage you to be more specific in any updated policy wording, steering built development outside SPZ1. Reference to a document called 'Groundwater Protection: Policy and Practice' should be updated to refer to 'The Environment Agency's approach to groundwater protection', February 2018 Version 1.2 - [The Environment Agency's approach to groundwater protection \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/682422/groundwater-protection-policy-and-practice.pdf)

Where mains surface water drainage is not possible, high quality SuDS systems will ensure developments within SPZ2 and 3 do not contribute to the pollution of controlled waters, including groundwater. These should be designed to be passive in order to prevent potential degradation in the event that maintenance is not carried out.

Groundwater Quantity & Water Resources

Specific Water Resource pressures are known to exist across much of the Wiltshire Area, including but not limited to Hampshire Avon, Bristol Avon, including Malmesbury Avon area, Bradford on Avon etc. Development in these areas should be conditioned to use the most water efficient technologies to reduce the water supply demands. Policy theme 1 refers to this idea directly - All new development should be designed in a manner that limits the daily consumption and disposal of water – whilst Policy theme 3 refers to sustainable design & construction, of which water efficiency could fit within. Wherever you wish to position water efficiency within your policy we would strongly encourage you to be specific about water use standards in new development. Currently this is enforced by Building Regulations part G, and limits water use to 125 litres per person per day. This has not kept pace with our need to address climate change, therefore the revised Local Plan should aim to better these regulations. (We are aware that Wiltshire Council specify 110 litres per person per day, but this is inconsistent across the Council area, and no longer low enough). We would argue that specifying a water use limit of 95 litres per person per day in new residential development would be entirely appropriate, for many reasons. It would contribute significantly to meeting objectives relating to carbon net zero, biodiversity protection, Hampshire Avon SAC protection, groundwater protection and more. As part of Policy theme 3 – sustainable design – it states "Such standards would need to be clear, easily implemented and not

put at risk the viability of development". Specifying 95 litres per person per day (as submitted in a water use calculator as part of planning applications) would be clear, easily implemented (using modern fittings/appliance technology) and would not risk the viability of development.

Notwithstanding the above, Wiltshire Council should ensure sufficient water resource supply headroom exists for development to take place, without having an adverse impact on the water environment and Hampshire Avon SAC.

As part of Policy theme 3 it is stated "All new development should support the collection and re-use of rainwater and grey water". We are unsure what this would really mean for a development. How does a development *support* rainwater collection if it is not required to *include* it? We would advise the use of the word 'include' instead of 'support', and the policy should include how this could be achieved.

Biodiversity

In the document called 'Addressing climate change and biodiversity net gain through the Local Plan' it is stated under Policy theme 1 that "...new built development should be in Flood Zone 1". However, many sites contain areas within Flood zones 2 & 3. Whilst there may not be an intention for 'built' development in these areas, any alterations within floodplains (landscaping/gardens, formal parks etc.) may give rise to unwanted impacts and lead to the disconnection of wildlife corridors. Areas within zones 2 & 3 should not be included within the area for built development to ensure that they continue to function as natural river floodplains without modifications. Also see section on blue/green infrastructure above. Dedicating these areas to blue/green infrastructure, such as linear country parks, can complement new developments whilst safeguarding the use of that land for flood management, biodiversity net gain, recreation, wellbeing etc.

Where there is described as 'a medium risk of flooding', and 'management measures are achievable', it is not clear what's meant by 'management measures' and how these are demonstrated to be achievable. We suggest this is expanded upon.

We would encourage you to require the biodiversity net gain element in new developments to be more ambitious than 10%. Following the climate and ecological emergency your Council has declared you could require a minimum of 20%. This would align with the Environment Agency's principle that our future flood risk management schemes will need to achieve a 20% biodiversity net gain.

A connected network for wildlife needs to be created across Wiltshire (and into surrounding areas) to prevent pockets of isolated biodiversity improvement. The creation of this network can be integrated with recreation, non-motorised transport, wellbeing, flood risk management and Water Sensitive Urban Design so that the network has multiple functions and benefits.

The document does not include any reference to Nature Recovery Network (NRN). The NRN is a major commitment in the [government's 25 Year Environment Plan](#) and part of the forthcoming Nature Strategy. Local policy should link to this commitment as it is expected that it will be delivered at district level - [Nature Recovery Network - GOV.UK](#)

Pollution Prevention

Adopted Core Policy 69 details measures required to protect the Hampshire Avon SAC from nutrient pollution. It will be necessary to update this policy to reflect the most

recent agreement made between Wiltshire Council, the Environment Agency and Natural England.

Site Specific Policy Documents

Chippenham

Chippenham has significant growth over the planned period. Whilst the sites selected appear to be adopting the sequential approach by being located in the low flood risk areas, there will be significant infrastructure requirements (such as bridges) that will cross the floodplain and the main river. The development of the infrastructure must not increase flood risk, and under National Planning Policy should be delivering flood risk betterment for the existing community and new development.

In addition the Chippenham River/Country Park should look at the opportunity to provide a longer length of park through the town and beyond. This should include the consideration of long term options to replace the radial gate and weir in the town centre that are near the end of their design lives. This would improve biodiversity (especially fish passage), provide increased amenity value and enable increased planting within the river corridor. It will also reduce the risk of flooding to the town centre if the radial gate were to fail in the future. This will also help mitigate the impacts of climate change. The Environment Agency is currently looking at the long term future of the radial gate in Chippenham, therefore including a policy to replace the radial gate and weir within this Framework document would support any future necessary project in this location.

Marlborough

Whilst site 660 and 661 (called site 1 in final pool) lie in Flood Zone 1 we would recommend that the following text is added specifically for Site 1: Land at Chopping Knife Lane within the Planning for Marlborough report:

The site lies adjacent to the floodplain associated with the River Kennet. Proposals for the development of the site will need to consider the effect of climate change on the fluvial flood levels from the river as they may affect lower areas on the site. The Environment Agency have a hydraulic model of the River Kennet at this location and they should be consulted when planning the development layout. Buildings on the lower part of the site should be made flood resilient. Climate change factors applied to fluvial flood flows should be in accordance with the National Planning Policy Framework and its guidance.

Development Site 2/ma1 lies almost entirely within SPZ 1 for Marlborough public water supply borehole. We recommend this site is eliminated and a more suitable alternative site found.

Amesbury, Salisbury, Warminster, Devizes

These areas are within the Hampshire Avon catchment which is currently failing protected area and WFD objectives because of elevated phosphorus. Increased phosphorus levels that may reach the Hampshire Avon as a result of the development should be offset in line with the Environment Agency and Natural England Hampshire Avon Nutrient Management Plan, Memorandum of Understanding and Local Authorities Supplementary Planning documents and other relevant documents/agreements.

Salisbury

In line with our comments above on SPZs, please reconsider the allocation of Site 1 and site 12. Where possible development should take place outside SPZs. A sequential

RWB61



Wiltshire Local Plan review consultation March 2021

Thank you for providing Historic England an opportunity to consider this consultation relating to the amount and distribution of new homes and land for employment; neighbourhood planning; climate change and biodiversity net gain.

Our following comments supplement those previously made in our letter of 18 December 2017 which mainly emphasised the need for any review to consider the current state of Wiltshire's historic environment and how its planning documents had performed regarding the delivery of a positive strategy for the historic environment (NPPF para 185). The scope of your proposals in this consultation may well have followed a review of how the current plan(s) have met their objectives, and how they have performed in relation to the delivery of sustainable development in respect of the historic environment. Is this evaluation available to view?

Our consultation response is informed by Historic England advice and guidance which you may also find useful in helping to provide a clear and positive strategy for the conservation, enjoyment and enhancement of Wiltshire's rich and varied historic environments.

- **The Historic Environment in Local Plans**
<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>
- **How to consider the Setting of Heritage Assets**
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>
- **Considering the historic environment when allocating sites in Local Plans**
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
- **Neighbourhood Planning and the historic environment**
<https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/>
- **Conservation Area Appraisal, Designation and Management**
<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>
- **Optimising housing density within historic places**
<https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/>

The 'Emerging Spatial Strategy'

The emerging spatial strategy indicates the proposed amount of new homes and land for employment that each main settlement should accommodate. We understand this has been informed by evidence including place-based assessments in *Formulating Alternative Development Strategies*, January 2021 (ADSs). These consider the (Red, Amber, Green) capacity of settlements in relation to historic environment, but you accept that such initial broad judgements may require further detailed evaluation.

We would support the Council's efforts to identify and allocate all brownfield sites, big and small, to help reinforce the often-compact nature of Wiltshire's historic settlements, their character and identity in an appropriate response to context, and in turn limiting sprawl and less accessible forms of development.

Having considered the suggested potential sites in each of the 15 x *Planning for...* reports we are concerned there may not be the capacity for every settlement to meet the spatial strategy commitments and levels of growth you envisage without causing significant harm to the historic environment, inconsistent with legislation, national policy, guidance and advice, rendering the spatial strategy relatively unsustainable, and the Local Plan potentially unsound.

National policy requires that significant adverse impacts on heritage assets be avoided and, wherever possible, alternative options employed that reduce or eliminate such effects. Consequently, we would welcome the Council's clarification that this draft spatial strategy does not predetermine the capacity of every settlement and that further evidence (e.g. additional more detailed evaluation of heritage and landscape capacity) may inform a review of those numbers and perhaps the inclusion of other sites in other settlements in that particular HMA or an adjacent HMA.

Historic England appreciates an initial level of evidence has been gathered and applied proportionate to an early 'sift' of sites. However, we also note that Wiltshire Council acknowledge further assessment and consideration of the historic environment is essential to determine whether or not the principle of certain sites is acceptable, and if so, the form they may take. This is an important matter as having considered the 15 Settlement reports we note several potential sites directly affect designated heritage assets and their settings.

At present without such evidence in the public domain, Historic England is unable to provide a fully informed view on whether sites affecting heritage assets are likely to safeguard their significance, and as such if the Local Plan has been prepared in accordance with legislation, national policy, guidance and advice for the historic environment. Our judgement on individual sites and such matters will consequently need to be deferred until that further evidence is available.

Nevertheless, for the time being, we have considered a sample of the suggested sites at Salisbury that we hope will help indicate, in our opinion, their potential suitability and the form of the further evidence that would be helpful for all other settlements. Please refer to an appendix to this letter for such an evaluation and response to the individual questions relating to each of the 15 settlements.

Neighbourhood Planning

We note that smaller village communities will be encouraged to identify their specific local housing requirements when preparing a Neighbourhood Plan (NP) and where a NP is not being prepared the Council has the option of allocating sites through a review of the Local Plan.

We note and welcome the Council's commitment to produce guidance for NP communities on site selection and framing proposals within their Plans that will help to ensure the historic environment is appropriately considered. Historic England would welcome the opportunity to help in the preparation of such clear and effective advice.

We look forward to continuing to work constructively with you on this important planning document.

Sincere regards.



Partnerships Team Leader
South West Historic Environment Planning Adviser
Historic England
Rohan.Torkildsen@HistoricEngland.org.uk

Appendix: Historic England response to the individual settlement proposals and related questions

Settlement	Historic England comment
<p>Planning for Amesbury</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character, below round archaeology and landscape setting. The Amesbury Conservation Area Appraisal and Management Plan is now 13 years old; to ensure the Local Plan is informed by up to date information about the historic environment it seems timely that this document is perhaps updated and supplemented by a setting assessment, mindful of the towns significant historic landscape context and proposed expansion.</p>
	<p>AM1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>Historic England considers that the character of the historic settlement, within its wider landscape setting, and the availability of suitability sites should inform the proposed scale and form of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an updated Conservation Area Appraisal.</p>
	<p>AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>An updated Amesbury Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>AM3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>An updated Conservation Appraisal and setting assessment can inform the availability of suitable development sites.</p> <p>Disclaimer – Historic England have not undertaken a detailed assessment of the suggested sites in and around Amesbury due to the additional evidence proposed to be gathered. We therefore respectfully reserve judgement on their suitability.</p>
	<p>AM4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p>

	<p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be helpful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>Up to date Conservation Appraisals and setting assessments will also help inform this exercise.</p>
	<p>AM5. Are there important social, economic and environmental factors you think we’ve missed that need to be considered, generally or in respect of individual sites?</p> <p>The information accompanying the consultation in the Settlement Profile does not appear to set out how a strategic understanding of the history, character and landscape setting has informed the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for each settlement is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, and undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by a site promoter.</p>
Planning for Bradford on Avon	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Bradford on Avon doesn’t appear to have a Conservation Area Appraisal and Management Plan and the towns character assessment is now 13 years old. The Council should consider whether an update is required, and also a setting assessment to inform edge of town expansion.</p>
	<p>BR1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitability sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council’s efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>
	<p>BR2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Bradford on Avon Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive</p>

	<p>strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>BR3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Bradford on Avon due to Wiltshire Council’s intention to provide further evidence. We therefore reserve judgement until then.</p>
	<p>BR4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>An up to date Conservation Appraisal and setting assessments, where appropriate, can help inform the Plan.</p> <p>It would be helpful to appreciate the judgements of the Council’s in-house heritage and landscape expertise, and any germane planning history. This information will be useful in relation to all 15 settlements.</p> <p>It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.</p>
	<p>BR5. Are there important social, economic and environmental factors you think we’ve missed that need to be considered, generally or in respect of individual sites?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for each settlement is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
<p>Planning for Calne</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Calne doesn’t appear to have a Conservation Area Appraisal and Management Plan but more importantly perhaps is the absence of a setting assessment to inform considerable proposed edge of town expansion.</p>

	<p>CA1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council’s efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by a Conservation Area Appraisal, currently absent.</p>
	<p>CA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>CA3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Calne due to Wiltshire Council’s intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>CA4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>An up to date Conservation Appraisal and setting assessment, where appropriate, can help inform the Plan.</p> <p>It would be helpful to appreciate the judgements of the Council’s in-house heritage and landscape expertise, and any germane planning history.</p>

	<p>It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.</p>
	<p>CA5. Are there important social, economic and environmental factors you think we've missed that need to be considered, generally or in respect of individual sites?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for Calne is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
<p>Planning for Corsham</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. It is unclear whether there are Conservation Area Appraisals and Management Plans available nor a setting assessment to inform considerable proposed edge of town expansion.</p>
	<p>CO1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by Conservation Area Appraisals, which appear to be absent.</p>
	<p>CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Conservation Area Appraisals and Management Plans and or a Heritage Topic Paper for the town can help inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p> <p>Have the Corsham Conservation Statement and 2015 Public Realm Study informed priorities?</p>
	<p>CO3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p>

	<p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within and around the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Corsham due to Wiltshire Council’s intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>CO4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>Up to date Conservation Appraisals and setting assessment, where appropriate, can help inform the Plan.</p> <p>It would be helpful to appreciate the judgements of the Council’s in-house heritage and landscape expertise, and any germane planning history.</p> <p>It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.</p>
	<p>CO5. Are there important social, economic and environmental factors you think we’ve missed that need to be considered, generally or in respect of individual sites?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for Corsham is recommended; and a strategic landscape setting assessment and up to date Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
<p>Planning for Chippenham</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and, in particular, Chippenham’s landscape setting and surrounding heritage assets. A heritage topic paper and up to date setting assessment for the town and affected assets will be important, mindful of the scale and distribution of potential development.</p>
	<p>CP1. What do you think to this scale of growth? Should there be a brownfield target?</p>

	<p>Should it be higher or lower?</p> <p>The form and character of the town and surrounding villages, within its landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl.</p> <p>An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape. An accurate capacity can be informed by up to date appraisals for the affected Conservation Areas. We note the Chippenham Conservation Appraisal and Management plan are somewhat dated and others may be absent e.g. Allington. The absence of such important evidence should be addressed.</p>
	<p>CP2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Conservation Area Appraisals, Management Plans and a Heritage Topic Paper for the town can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>CP3. Do you agree these sites are the most appropriate upon which to build? If not, why not?</p> <p>We note that the Council has considered the impact of development on the historic environment, but it isn't clear how it has informed the spatial strategy and site selection. A heritage topic paper could usefully provide this narrative. It can also include the judgements of the Council's in-house heritage, archaeological and landscape expertise, and any germane planning history. We will defer a detailed evaluation of the suggested sites until such information is available.</p> <p>Needless to say, it will be important for any heritage topic paper to highlight how relevant legislation, national policy, guidance and advice for the historic environment has been applied.</p>
	<p>CP4. What are the most important aspects to consider if these sites are going to be built on?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform development in accordance with national policy. Historic England's published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>CP5. How can these concept plans be improved?</p> <p>At present it is unclear how an understanding of the significance of the historic</p>

	environment (heritage assessment) has informed the concept plans.
	<p>CP13. Is there anything we have missed that needs to be considered in planning for Chippenham?</p> <p>We hope the previous responses to Q CP1-5 will help to inform the further planning work to be undertaken.</p>
Planning for Devizes	It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and, in particular, Devizes landscape setting and surrounding heritage assets. A heritage topic paper and up to date setting assessment for the town and affected assets will be important, mindful of the scale and distribution of potential development, and proximity to heritage assets.
	<p>DE1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl.</p> <p>An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area appraisal. We note the towns conservation statement is now 15 years old.</p>
	<p>DE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal, Management Plan and a Heritage Topic Paper for the town can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>DE3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Devizes due to Wiltshire Council's intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential</p>

	enhancement.
	<p>DE4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform development in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>DE5. Are there important social, economic or environmental factors you think we’ve missed that need to be considered, generally or in respect of individual site?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for Devizes is recommended; and a strategic landscape setting assessment and up to date Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>DE6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire’s infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any other issues, needs and opportunities relating to the historic environment.</p>
Planning for Malmesbury	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Malmesbury doesn’t appear to have an up to date and the towns character assessment is now 13 years old. The Council should consider the preparation of a setting assessment to inform edge of town expansion and also whether an update of the 2010 Conservation Area Appraisal and Management Plan is required.</p>
	<p>MM1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitability sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council’s efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date</p>

	Conservation Area Appraisal.
	<p>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>An up to date Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>MM3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether an updated Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council’s intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>MM4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>An up to date Conservation Appraisal and setting assessment might help inform the Plan.</p> <p>It would also be helpful to appreciate the views on proposals of the Council’s in-house heritage and landscape expertise, and any germane planning history.</p>
	<p>MM5. Are there important social, economic or environmental factors you think we’ve missed that need to be considered, generally or in respect of individual site?</p> <p>It is evident the Council appreciate that further heritage evidence needs to be gathered and applied.</p>
	<p>MM6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire’s infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic toper could establish the issues, needs and opportunities</p>

	relating to the historic environment.
Planning for Marlborough	It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. Marlborough doesn't appear to have a Conservation Area Appraisal and Management Plan and a setting assessment to inform edge of town expansion would be invaluable.
	<p>MB1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>
	<p>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>MB3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>MB4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-</p>

	site-allocations-in-local-plans/
	<p>MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>MB6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is considered an important component part of Wiltshire's infrastructure; described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>
Planning for Melksham	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. Melksham doesn't appear to have a Conservation Area Appraisal and Management Plan but more importantly perhaps is the absence of a setting assessment to inform considerable proposed edge of town expansion.</p>
	<p>ME1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>
	<p>ME2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	ME3. Is this the right pool of potential development sites?

	<p>Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and in particular a setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council’s intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>ME4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>ME5. Are there important social, economic or environmental factors you think we’ve missed that need to be considered, generally or in respect of individual site?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>ME6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is considered an important component part of Wiltshire’s infrastructure; described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any ‘other issues’, needs and opportunities relating to the historic environment.</p>
<p>Planning for Royal Wootton Bassett</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Royal Wootton Bassett doesn’t appear to have a Conservation Area Appraisal and Management Plan but perhaps more importantly is the absence of a setting assessment to inform considerable proposed edge of town expansion.</p>
	<p>WB1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p>

	<p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape.</p>
	<p>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Historic England welcome inclusion of the following priorities: protecting the distinct character and identity of the town; safeguarding the historic alignment of the Wilts and Berks Canal and taking forward canal restoration; conserving and enhancing environmental assets around Royal Wootton Bassett; maintaining the town's elevated historical setting and central conservation area.</p> <p>Have these priorities been informed by a particular study of the town? A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper could certainly demonstrate how the towns 'priorities' have been identified and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>WB3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a setting assessment would help inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>WB4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>WB5. Are there important social, economic or environmental factors you think</p>

	<p>we've missed that need to be considered, generally or in respect of individual site?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>WB6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is considered an important component part of Wiltshire's infrastructure; described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>
Planning for Salisbury	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character, below ground archaeology and, in particular, its landscape setting. The Council should consider whether an up to date setting assessment for the town is required.</p>
	<p>SB1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape.</p>
	<p>SB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>We broadly welcome these priorities.</p> <p>The Conservation Area Appraisal and Management Plan and a Heritage Topic Paper can help to further inform potential additions and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>SB3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a strategic and up to date setting assessment is</p>

required to inform the promotion of suitable development sites.

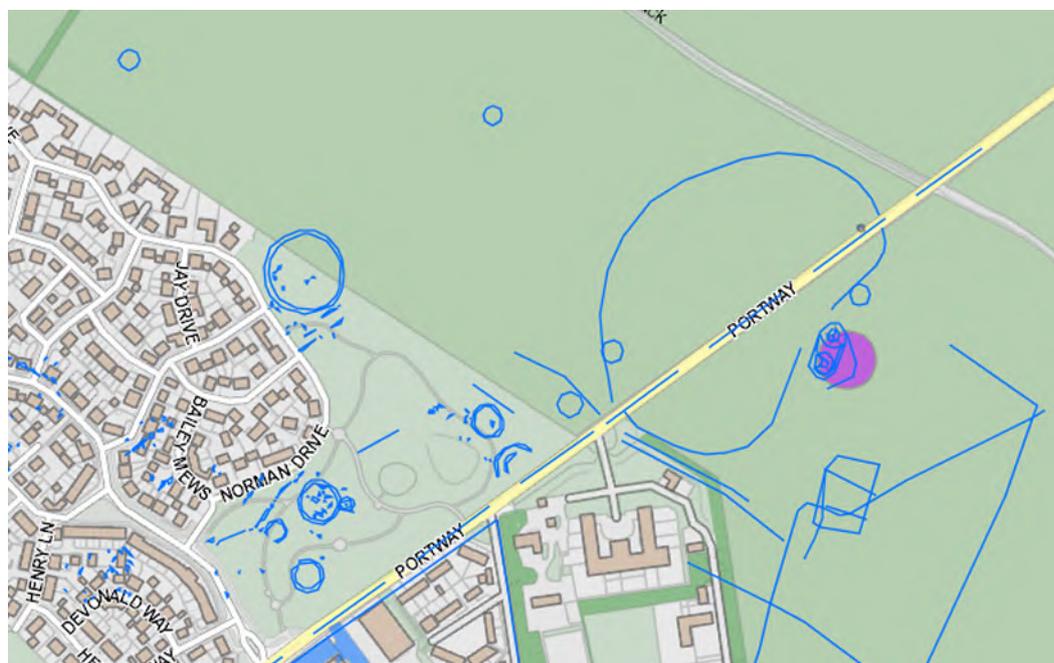
Site 1: Land NE of Old Sarum

“The site’s landscape character is prominent and exposed, with few hedgerows, and assessment shows that any development would have to accommodate this successfully whilst taking account of the setting for Ende Burgh scheduled long barrow to the east of The Portway”.

Without further expert assessment by the local authority as part of the plan making process and subsequent clear and appropriate response to the numerous heritage concerns, one must question how such development might successfully be accommodated in this sensitive and historic landscape setting.

Currently the view of the local authority’s in-house heritage and landscape expertise isn’t apparent. We assume the planning history and evidence base associated with previous planning applications and development plans also continue to be relevant and may help inform the principle of development today.

It isn’t clear how the indicative concept diagrams accompanying the consultation acknowledge or positively respond to the significance of numerous on and off-site heritage matters.



From our initial assessment we note that the barrow is not very well understood and could be Bronze Age or Roman, it could be one barrow or two. If Bronze Age, then it is likely to be part of a wider cemetery with other known barrows in the area (not scheduled as ploughed flat) including a large example on the north edge of the current development northwest of the Portway. Views to and from other Bronze Age monuments then becomes a factor of its significance.

If Roman, then it is likely to be associated with the Portway Roman Road and may be part of a cemetery along the road here. There is a single ditched oval enclosure next to it

	<p>which goes across the road. This may be Roman, and it may define a cemetery.</p> <p>The barrow is a significant landscape feature sitting on a high point in the landscape and is visible from a wide area. As a burial marker it was meant to be seen and to project power and control, the person buried here was important and they wanted to make sure everyone knew it.</p> <p>The undesignated barrows are the circles (single and double) forming a small cemetery. The public space next to Norman Drive preserves these.</p> <p>The view from Figsbury Ring may also be important, as is (certainly) the relationship of the site to the adjacent Monarchs Way, and Old Sarum heritage assets within their wider landscape setting.</p> <p>The nations heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. One must carefully consider whether further expansion of the current development off the Portway would accord with such national policy, legislation, guidance and advice to help protect such finite and nationally important heritage assets and their appreciation within context i.e. their setting.</p>
	<p>Site 6 & 7 Downton Road</p> <p>These sites to the south east of the city relate to several important heritage assets including the Woodbury scheduled monument and related undesignated and less known archaeology; Britford conservation area and associated listed buildings; the Salisbury conservation area, River Avon and meadows, and; the wider historic landscape setting including views of the Cathedral - all important matters to inform the relative suitability of these sites.</p> <p>It would be helpful to appreciate the thoughts of the council's in-house heritage and landscape expertise on how such matters have informed these proposals, and any previous planning history that may still be relevant.</p> <p>It will be important to demonstrate how legislation, national policy, guidance and advice for the historic environment has been applied, and in particular how the Britford conservation area appraisal and management plan has been considered especially in relation to site 6.</p> <p>Certainly, further expert assessment appears to be required as part of the plan making process to better understand the extensive and important below ground archaeology, and to better explain a contextual and positive response to the historic environment that would be required, should the principle be deemed appropriate.</p>
	<p>SB4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful.</p>

	https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/
	<p>SB5. Are there important social, economic and environmental factors you think we've missed that need to be considered, generally or in respect of individual sites?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
Planning for Tidworth and Ludgershall	It will be important to demonstrate how proposals have considered and responded to the historic environment, in particular below ground archaeology, landscape setting and surrounding heritage assets. A heritage topic paper and up to date setting assessment will be important, mindful of the scale and distribution of potential development.
	<p>TL1. What do you think to this scale of growth? Should there be a brownfield target?</p> <p>Historic England considers that the character of these historic settlements, within their wider landscape setting, and the availability of suitability sites should inform the proposed scale and form of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s).</p>
	<p>TL4. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A heritage topic paper might identify certain heritage matters requiring priority attention.</p>
	<p>TL5. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a setting assessment is required to inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then.</p>
	TL7. Are there important social, economic or environmental factors you think

	<p>we've missed that need to be considered, generally or in respect of individual site?</p> <p>A heritage topic paper might identify certain heritage matters requiring attention.</p>
	<p>TL8. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire's infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>
Planning for Trowbridge	<p>It will be important to demonstrate, perhaps in a discrete heritage topic paper, how proposals have considered and responded to the historic environment, the town's history, character and, in particular, it's landscape setting and surrounding heritage assets such as Hilperton Conservation Area. It appears a setting assessment for the town and affected assets has been undertaken. This will be useful evidence to consider, and we assume will be publicly available in due course.</p>
	<p>TB1. What do you think to this scale of growth? Should there be a brownfield target? Should they be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape.</p>
	<p>TB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185). At present it isn't clear how these priorities have been established.</p>
	<p>TB3. Do you agree these sites are the most appropriate upon which to build? If not, why not?</p> <p>We assume that an understanding of the history, character, identity, appearance and landscape setting of the town has informed the level of growth and site suitability in accordance with national policy. We hope Historic England's published advice on site allocations may have been useful.</p> <p>https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
Planning for	<p>It will be important to demonstrate, perhaps in a discrete heritage topic paper, how</p>

<p>Warminster</p>	<p>proposals will have considered and responded to the historic environment, the town's history, character and, in particular, its landscape setting and surrounding heritage assets. Warminster and Bishopstrow do not appear to have a Conservation Area Appraisal and Management Plan but perhaps more importantly is the apparent absence of a setting assessment to inform considerable potential edge of town expansion.</p>
	<p>WA1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>Historic England considers that the historic form and character of a historic settlement within its wider landscape setting, <u>and</u> the availability of suitable sites should inform the proposed scale of growth.</p> <p>We support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant or underused buildings of historic or architectural interest to help reinforce the character of the town and in turn limit sprawl. An ambitious target is encouraged although the related future capacity (amount of development) must relate to the context of the site(s) and the future form should ensure a good fit with the townscape.</p> <p>Historic England has prepared advice on optimising housing density within historic places which may be helpful. https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/</p>
	<p>WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Conservation Area Appraisal's and Management Plan's for the town and Bishopstrow, and a Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).</p>
	<p>WA3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>Conservation Appraisal's and a strategic setting assessment will be important evidence to inform a site's suitability.</p> <p>Disclaimer – Historic England have not undertaken a detailed assessment of the suggested sites in and around the town due to the additional evidence proposed to be gathered. We therefore respectfully reserve judgement on their suitability.</p>
	<p>WA4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>Wiltshire council acknowledge that further assessment and consideration of the historic environment is essential to determine whether or not the principle of certain sites is acceptable and if so the form they may take. At present without such evidence in the public domain, Historic England is unable to take a view on whether the Local Plan has been prepared in accordance with legislation, national policy, guidance and advice for</p>

	<p>the historic environment. Our judgement on such matters will consequently need to be deferred.</p> <p>Wiltshire Council explored several potential sites during the preparation of the recent Wiltshire Housing Allocations Plan's (2020). No doubt this experience can inform the current plan making process.</p> <p>Historic England's position on Site 2 East of Deane is illustrated by our previous statement provided for the Planning Inspectorate's Examination of the aforementioned Housing Allocations Plan. https://www.wiltshire.gov.uk/article/2353/Wiltshire-Housing-Sites-DPD-Examination</p> <p>This current consultation suggests a much larger site that may well exaggerate the impact and degree of harm.</p>
	<p>WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>WA6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire's infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>
<p>Planning for Westbury</p>	<p>It will be important to demonstrate, perhaps in a discrete heritage topic paper, how proposals will have considered and responded to the historic environment, the town's history, character and, in particular, it's landscape setting and surrounding heritage assets. Westbury doesn't appear to have an up to date Conservation Area Appraisal and Management Plan but perhaps more importantly is the apparent absence of a setting assessment to inform considerable potential edge of town expansion.</p>
	<p>WE1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield</p>

	development) must relate to the context of the site(s) ensuring a good fit with the townscape.
	<p>WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185). At present it isn't clear how these priorities have been established.</p>
	<p>WE3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a setting assessment could help inform the promotion of suitable alternative development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>WE4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>We note several proposed sites affect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.</p>
	<p>WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?</p> <p>A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.</p>
	<p>WE6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is an important component part of Wiltshire's infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.</p>

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RWB62

Spatial Planning
Wiltshire Council

Via email: spatialplanningpolicy@wiltshire.gov.uk

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4th March 2021

Dear Spatial Planning Team,

THE WILTSHIRE LOCAL PLAN AND GYPSIES AND TRAVELLERS PLAN CONSULTATIONS

Highways England welcomes the opportunity to comment on the Wiltshire Local Plan and Gypsies and Travellers Plan. As you will be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises parts of the M4, A303, A36 and A419. It is on the basis of these responsibilities that the comments that follow in this letter have been made.

Highways England is keen to ensure that transport and land use planning policy is closely integrated and that the network is able to deliver sustainable economic growth. In this respect, Highways England draws your attention to “The Strategic Road Network - Planning For The Future - A Guide To Working With Highways England On Planning Matters”, Highways England’s Licence issued by DfT and DfT Circular 02/2013, which sets out how we will engage with the planning system to deliver sustainable development.

We are interested in the potential traffic impacts of any development site proposals and/or policies coming forward through the Local Plan process and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy.

Paragraph 12 of Circular 02/2013 states that *‘The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.’*

Paragraph 15 states that *‘In order to develop a robust transport evidence base [for local plans], the Agency (now Highways England) will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.’*

Paragraph 18 states that *‘Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.’*

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the MHCLG National Planning Policy Framework (NPPF), DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development, and in our guide The Strategic Road Network – Planning for the Future.

The NPPF sets out that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees. (para 16).

Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed. (para 102).

The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. (para 103).

Planning policies should be prepared with the active involvement of highways authorities and other transport infrastructure providers so that strategies and investments for supporting sustainable transport and development patterns are aligned. (para 104).

Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. (para 122).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. (para 109).

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (including transport). Such policies should not undermine the deliverability of the plan. (para 34).

In summary; as a minimum, in order for the transport evidence base to satisfy the requirements of NPPF and Circular 02/2013, it is necessary to establish:

- The transport impacts of the development allocations.
- The improvements necessary to ensure that the impacts are not severe.
- Any land required for the delivery of the necessary improvements
- The cost of the necessary improvements.

- Any other deliverability constraints.

Paragraphs 9 and 10 set out the approach that Highways England takes in relation to development proposals as follows:

“9. Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

10. However, even where proposals would not result in capacity issues, the Highways England’s prime consideration will be the continued safe operation of its network”.

Applying the principals of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating at over-capacity levels, or cannot be safely accommodated, i.e. a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact. In order to establish whether a section of the SRN has a severe impact, an assessment of additional traffic on the SRN as a result of the development proposals will be necessary, and agreement should be sought on the best way to establish whether the additional traffic constitutes a severe impact.

EMERGING SPATIAL STRATEGY

This consultation discusses the provision of housing and employment in Wiltshire to 2036 and where demand needs to be satisfied. The emerging strategy plans for a further 18,000 homes in addition to current commitments and allocations. At para 3.22 the link between the scale of growth and the need to consider the impact of this growth on transport is made, with growth at Chippenham, Salisbury and Trowbridge specifically mentioned. The A36, passes through Salisbury and M4 Junction 17 is closely related to Chippenham and connects the A350 to the M4 motorway.

Alternative development strategies have been identified and tested through a sustainability appraisal, and preferred and potential development sites identified. In the Principal Settlements of Chippenham, Salisbury and Trowbridge, preferred development sites have been identified. In the Market Towns, of which the following are of particular interest to Highways England (Amesbury, Royal Wootton Bassett and Warminster), potential development sites have been identified. The preferred and potential sites have been reviewed below, if other sites were to come forward, it is noted that additional issues may arise.

Chippenham

The amount of proposed development at Chippenham is substantial. Though the town is located about 3 miles south of M4 J17, it is acknowledged that additional development at Chippenham alongside new local road infrastructure will impact on the motorway junction. Work has been ongoing with Wiltshire Council to assess the impacts under various scenarios and identify a comprehensive

scheme that can accommodate the additional growth. The preferred development sites are predominantly located to the east and south of Chippenham.

The review of transport issues in the Principal Settlement report is limited to highlighting key issues. Transport issues are described in more detail in the Transport Review (January 2021) report, which is discussed below. Given the scale of proposed development, it will be critical to understand and secure development phasing in relation to the provision of necessary new road infrastructure.

Royal Wootton Bassett

For the Swindon Housing Area, a potentially significant level of development at Royal Wootton Bassett has been proposed. The Emerging Spatial Strategy notes that there are potentially significant obstacles to overcome if growth is to be successfully delivered at Royal Wootton Bassett, notably managing the traffic that new homes will generate both within the town and at M4 junction 16. The Royal Wootton Bassett Market Town document notes the potential impacts at M4 J16 and the issue of noise at two of the proposed development sites which abut the M4. The Transport Review report makes little reference to Royal Wootton Bassett and any impacts of this development. We would welcome information on what the transport challenges are likely to be and how it is proposed that these will be mitigated.

Salisbury

For the Salisbury HMA, there is no explicit mention of the A36 or the A303 in the main Emerging Spatial Strategy document. However, in the Salisbury Principal Settlement document, settlement profile table, the Transport section highlights the benefits of the A36 as a route that avoids the city centre, but also notes that the A36 acts as a barrier to walking and cycling movement. The table notes under Opportunities that there is the possibility of major road funding and A36 junction upgrades. No further information is provided. It would be helpful to understand more about what is envisaged for the A36 beyond the Major Road Network (MRN) proposals, on which we are already engaged.

There is one preferred development site adjacent to the A36, Land at Quidhampton Quarry. Highways England notes that quarry operations ceased over a decade ago and the site has not been in active use. We have significant concerns about the existing site access arrangements and further consideration regarding safe and suitable access for any proposed future use will be necessary for the site to be deliverable.

Amesbury

Also in the Salisbury HMA is Amesbury. The Amesbury Market Town document notes that two of the three potential selected sites abut the A303 and there could be noise and air quality issues, which will need to be mitigated alongside any other impacts on the integrity of the asset. The priorities highlighted for the area include improved infrastructure and transport, particularly relating to the A303 and A345 (both of which currently experience congestion) to improve linkages to and from the town. The construction of the A303 Stonehenge scheme may offer some relief to the issues identified. It would be helpful to be aware what other, if any improvements, are also considered necessary.

It is assumed that both sites would be accessed from the local road network and not the A303. Highways England would welcome clarification of this within the emerging strategy.

Warminster

In the Trowbridge HMA, Warminster is identified as a Market Town. The A36 bypasses Warminster and currently forms a boundary to the built-up area. Two of potential development sites identified for Warminster abut the A36. In the review of Site 4: Land at Warminster Common and Land south of Wren Close, Warminster, the issue of noise and air quality arising from proximity to the A36 is recognised. We will seek a suitable buffer between the road and any new development. In the review of Site 8: Land at Brick Hill and Land between Bath Road and A36, noise and air quality are not mentioned, but as with Site 4, the issues equally apply. Further consideration will also need to be given to any other impacts on the integrity of the infrastructure asset including drainage and landscape.

Overall, the Warminster Market Town document recognises that potential impacts on the A36 will need to be assessed. There is no specific reference to impacts on the A36 at Warminster in the Transport Review report, hence we would encourage the transport review work to include an assessment of the A36 at Warminster.

It is assumed that both sites would be accessed off the local road network, not the A36. Highways England would welcome clarification of this within the emerging strategy.

Wiltshire Local Plan – Transport Review (January 2021)

To support the assessment the Emerging Spatial Strategy, a Transport Review report has been produced by Atkins on behalf of Wiltshire Council. This report considers existing traffic conditions, sets out how future development and planned transport improvements schemes have been added to the network and sets out a high level assessment of the impact of the proposed growth and whether further mitigation is required. The focus of this report has been Chippenham and Salisbury, with limited reference to other locations for development in Wiltshire.

The report notes that the assessment has been undertaken using the Wiltshire strategic model, which has a 2018 base. Highways England has been engaged on the production of the base year for this model, which is based upon the Highways England Regional Transport Model. We accept this model as an appropriate base for the assessment of the local plan impacts.

Section 2 of the report sets out the model scenarios for the assessment of the proposed growth. The principle of the scenario structure is reasonable, but we note that some of the schemes that are proposed to be included in the 2036 Do Minimum scenario are substantial schemes that are currently the subject of Government funding bids and as such are not yet guaranteed. Hence, there is a risk that if these bids are not successful, the basis of the assessment will have changed.

The forecasting of trip demand from the proposed allocations has utilised trip rates from the TRICS database. This provides a good clarity on the rates being used. It is assumed that rates contained in Table 2-2 of the report are vehicle per dwelling rates. Confirmation of this would be welcomed.

Section 2.3 lists the Do-Nothing and Do-Minimum infrastructure assumptions. These are considerable, and assuming delivery of some of the schemes carries some risk. Hence, we assume that the schemes included in the modelling assessment will also be included in the relevant development allocation policies as necessary prior to commencement of new development. If this is not the case, it would be helpful to understand what phasing would be assumed and what measures would be taken if the development were to advance ahead of the delivery of infrastructure. It is

suggested within the report that the A303 Stonehenge (Amesbury to Berwick Down) improvement been assumed in the Do Nothing and/or Do Minimum scenario. Further clarification would be welcome in this regard.

Section 2 contains various plots of data from the Wiltshire SATURN model. As we are aware that in its original form the South West Regional Transport Model is a peak period model, we note that the various plots refer to AM peak period (08:00-09:00). We assume that this means that the model used for the assessment is a peak hour model, but clarification would be helpful. The distinction between peak period and peak hour is important when considering a suitable threshold to identify a severe or unacceptable impact.

Section 3 of the report considers the mitigation of the Local Plan. The hierarchy is taken from the Wiltshire Local Transport Plan, which considers walking and cycling measures first, then public transport and then highway interventions as a last step. We are content with this approach, but expect that any alterations made to the highway impact analysis using the traffic model will be clearly stated and evidence provided to substantiate any mode transfers.

It is noted in the report and its appendices that standard methodologies have been used to assess the likely modal shift from car based trips to walk/cycle and public transport. Use of standard methodologies is welcome. A summary, how the location of the non-home end of the journey is taken into consideration. For the SRN, it is longer distance bus journey and rail journeys that could offer an alternative to using the SRN, but it is only appropriate to forecast a transfer of mode when the destination location of the journey is also within reasonable distance of the public transport interchange point and the journey is not convoluted (i.e. involving many changes which in reality may not be coordinated resulting in long journey times).

Section 4 of the report provides some conclusions and a summary. In reviewing the potential impacts without mitigation. M4 Junction 17 is specifically mentioned as a pinch-point. Hence, we are particularly interested in working with Wiltshire Council going forward to better understand the assessment undertaken and to identify appropriate mitigation.

The promotion of active modes is welcome from a wider sustainability and health point of view. Unfortunately for the operation SRN, however, journeys taking place on the SRN tend not to be those that can be readily undertaken by walking and cycling. Hence, our interest in these local trips is more focussed on accepting the way in which these are identified and quantified, so that we can be comfortable that the appropriate proportion of short and longer distance trips have been calculated as arising from the proposed allocations.

We have commented on the opportunities that public transport, primarily rail, can offer as an alternative to using the SRN. We have also noted that there needs to be careful consideration of the whole journey in order to be confident that it is realistic to assume a transfer of mode could realistically take place. In section 4.2.2, the uncertainty of future public transport networks and utilisation of services following the Covid-19 pandemic is described. We acknowledge this uncertainty, and agree that further work is necessary to be confident regarding the take up and indeed availability of public transport services going forward.

The highway impacts and mitigation are summarised in section 4.2.3. As previously mentioned, the report describes a number of substantial road schemes that have been identified as necessary to accommodate the envisaged growth. These are at various stages of feasibility and design, and some are the subject of funding bids to Government. There is also a need to secure planning permission

and other licenses to allow their implementation. As the combination of schemes has been shown to impact on the SRN, we are interested in understanding how the delivery of the schemes will relate to the delivery of the proposed allocations in the plan and how the delivery of the development allocations will be regulated to ensure that the necessary infrastructure is delivered alongside or in advance of the development. It is noted that the report states that a Major Road Network scheme has been developed for M4 Junction 17. We have been working with the Council on this scheme and will continue to do so to further refine the scheme through the detailed design processes.

Section 4.4 sets out some recommended next steps and locations for further investigation. We note that this specifically includes further assessment of the Market Towns, which we have noted in this letter as currently absent. We therefore look forward to building on our regular engagement with Wiltshire Council regarding the development of the transport evidence base.

PLANNING FOR WILTSHIRE'S GYPSY AND TRAVELLER COMMUNITIES – CONSULTATION

This consultation sets out the Council's proposed approach to addressing the accommodation needs of the Gypsy and Traveller communities in Wiltshire to 2036.

Highways England is satisfied with the broad scope of the consultation document and the three objectives, particularly objective 3 which seeks to ensure sites are appropriate and sustainable with regards to access.

The consultation document outlines the approach to identifying sites, which appears to be reasonable, as well as the proposed assessment criteria for both permanent and emergency stopping sites. Highways England welcomes the inclusion of assessment criteria related to ensuring the sites do not result in a detrimental impact on the safe operation of the SRN and are served by safe vehicular access. However, it may be beneficial to both the local and strategic highway authorities for the criteria wording to better reflect the requirements of NPPF and outline that vehicular access should be safe and suitable for all users and that the proposed development does not result in an unacceptable impact on highway safety.

We also welcome the inclusion within the assessment criteria of site servicing considerations, particularly with regards to drainage and water disposal, which should help to address unauthorised connections for any site in proximity to the SRN.

Highways England requests that as potential sites are identified we continue to be engaged by the Council to help determine any potential impacts on the SRN and the site's suitability against the identified assessment criteria.

We trust that our response will be helpful and assist you with preparing your Local Plan. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely

[Redacted signature]

[Redacted name] - South West Operations Directorate

Email: [Redacted email address]

RWB63

Economic Development & Planning
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GL3 3TE

For the attention of Spatial Planning

spatialplanningpolicy@wiltshire.gov.uk

6th March 2021

Dear Sir or Madam

Wiltshire Local Plan Review Consultation

Please find attached Railfuture's response to the above Consultation. Our comments are arranged by the headings for the individual towns as appropriate and relate mainly to the topic of Transport.

If anything in this response requires clarification, please let me know.

Yours sincerely

[Redacted Signature]

[Redacted Name]

Railfuture
Secretary, Severnside Branch.

Planning for Bradford-on-Avon

We agree that the town has a very good train service but it would seem to be difficult to connect it directly by rail to Chippenham and Swindon without either reversal at Trowbridge or reinstatement of the northern curve at Bradford Junction which was removed in the early 1990s.

Planning for Chippenham

We support the intention (para.26, item ii) to make further improvements to the railway station, particularly in terms of interchange with bus services, of which those to Calne should be a priority. We hope the Council will press for completion of the deferred sections of Great Western electrification, including Chippenham to Bath and Bristol Temple Meads.

In listing the key features under Transport, the consultation document has omitted to mention that Chippenham is on the TransWilts rail route, which has enjoyed an enhanced service since December 2013.

Planning for Corsham

We welcome the intention (para. 22, item v) to safeguard land for reopening of a railway station. A station would almost certainly be viable, not only because of its position on a main line to Bath, Bristol, Chippenham and Swindon but because Corsham is now a significant centre of employment itself, notably at the Science Park. A Bristol- Oxford service could call at this station and at Royal Wootton Bassett.

Planning for Devizes

Railfuture strongly supports the proposed Devizes Parkway station at Lydeaway and is pleased that the Council has made a successful bid for Restoring Your Railway funding towards a feasibility study.

We note under the topic of Housing needs, a forecast decrease in the population of working age. If this is in absolute numbers, as distinct from a percentage of the overall population, it would suggest a need for better connectivity with larger centres of employment. We believe the proposed station would increase access to job opportunities.

Planning for Malmesbury

Malmesbury, like Devizes, is about three miles from a main line railway but has no station. Given the town's favourable economic situation and its tourist potential, consideration should be given to opening a station on the South Wales- London main line, either at Little Somerford, accessed via the B4042; or where the A429 passes under the line. As this line is electrified, a semi-fast service could be provided using Class 387 electric multiple units.

Our preferred station site would be Little Somerford because all the required land appears to be railway owned and within Network Rail fences; there is parking space in the former goods yard on the up side of the line; the site is marginally nearer to Malmesbury than is the A429 road bridge and there is space to relocate the former up platform slightly westward to avoid a lineside structure.

By contrast the A429 site would require platforms to be built on an embankment and acquisition of farmland for parking.

Planning for Marlborough

Although Marlborough has bus links to Bedwyn and Pewsey stations, the town's importance as a tourist destination makes a case in the longer term for reopening one of the two former rail lines from Savernake. We would ask the Council to safeguard the more westerly GWR formation, as it would avoid the tunnel on the former Midland & South Western Junction route.

Planning for Melksham

We support the work being undertaken by TransWilts Community Rail Partnership, GWR, Network Rail and Wiltshire Council to improve the environment and facilities at Melksham station, as well as the walking routes towards the station.

We agree that the TransWilts route needs more frequent train services. Its capacity is constrained by the 8 ½ mile single track section between Thingley Junction and Bradford Junction. The TransWilts service tends to be reduced whenever the line is used for diversion of InterCity and freight trains. When funding permits, a passing loop or loops should be created on the present single track. Additional signaling would also enable trains to follow more closely in one direction.

Planning for Royal Wootton Bassett

Whilst we support the need for a railway station, we would query the stated cost of £30m to £50m. This amount would be way above anything being quoted elsewhere for new stations at towns of comparable size and would suggest that a massive Parkway station with platforms on both the Bristol and South Wales lines is being contemplated.

By way of comparison, Worcestershire Parkway station, which opened in 2020 with three platforms on two different levels, a 500-space car park and a large covered booking hall, was estimated in 2016 to cost £22m.

We would suggest that a two-platform station with adequate access, signage and weather protection would be more appropriate for Royal Wootton Bassett, although additional signalling may be required. A Bristol-Oxford service would not require platforms on the South Wales line.

Planning for Trowbridge

The railway station was improved with additional waiting accommodation and a second entrance in 2015. Redevelopment of the Bowyers site presents an opportunity to build on those improvements by creating a transport hub including a relocated bus station.

Planning for Warminster

We support extension of TransWilts services to Salisbury and Southampton. The railway station has a sizeable rural catchment area to its south and there is a case for improving connectivity between train and bus services.

Planning for Westbury

We agree that Westbury station is an important rail hub with train services in six directions. It needs improved connectivity with buses and between east-west and north-south train services. Reinstatement of the fourth platform would allow more trains to connect at any one time and improve the opportunities for cross-platform interchange, which is essential for less able passengers.

RWB64a

Comments by Wiltshire Ramblers on Wiltshire Local Plan consultation document

Wiltshire Ramblers are very disappointed that there is not one mention, as far as we can see, of Public Rights of Way (ProW) in any of the constituent documents comprising the consultation document.

The paragraph in the succinctly named ‘**Addressing Climate Change and Biodiversity Net Gain through the Local Plan - raising the ambition**’ paper in which we would have expected PRowS to be considered is 4.6. In this paragraph five themes are identified for closer investigation and evidence gathering, and theme 5, ‘Promoting sustainable transport, active travel and air quality’ is the relevant one. This gives rise to Consultation Question B13, ‘What practical policy steps should the Local Plan take to significantly increase modal shift to public and active transport, and speed up the transition to greener fuelled vehicles?’

The Wiltshire Core Strategy (which it appears is to be superseded by the Local Plan) envisaged supporting improvements to the PRow network, but was vague about how this should be done. There has been a great deal of publicity over recent months about encouraging ‘Active Travel’, that is walking and cycling locally rather than going by car. This is envisaged to lead to substantial reductions in carbon emissions. However this will not be achieved without a significant amount of investment, especially if it is intended to see results by 2030, which is only nine years away. This will need to be done by optimising car free routes between towns and villages, and integrating these with public transport.

Wiltshire’s vast network of PRowS – there are nearly 4,000 miles of these – invites many possible choices for Active Travel routes, but there are enormous obstacles to be overcome:

- 1) Wiltshire’s PRowS are a legacy of the 1940s and 1950s, so any of them identified as being appropriate for Active Travel routes are likely to need rationalisation and upgrading to make them attractive enough to persuade car drivers that they can be used as an alternative

- 2) The choice of routes to be nominated for Active Travel will entail local research and consultation, through Parish Councils and interest groups
- 3) There will inevitably be objections and legal challenges from local residents and landowners to overcome
- 4) The health and climate emergency gains of Active Travel will require a great deal of ongoing publicity and campaigns to retain support
- 5) Routes should be compatible with local bus services, and their providers' coordinated publicity sought

There are obvious difficulties in implementing this programme, the most pressing of which is that the present Countryside and Rights of Way department has the expertise but is woefully short of staff that could supervise it. The department has suffered from almost continuous cuts to its budget since the austerity programme began in 2010, and appears to be the last in a long line of Council departments when considering its relative importance and need for additional funding. There are at present only 6 Countryside Access Officers to attempt to deal with the very high volume of path problems being reported by the walking public - some 1400 since September last year, we understand, not to mention the number of path problems accumulated up to then.

Although it is our experience that the Countryside Access Officers do an outstanding job given the meagre resources at their disposal, this staffing level is clearly hopelessly inadequate. An early reassessment of the department's staff requirements should be made to enable it to support Active Travel in a meaningful way so as to produce tangible results by 2030. If this is done it will also take the department a long way towards being able to fully address the key issues set out in paragraph 8.2 of the Council's Countryside Access Improvement Plan 2015-2025.

The health benefits of walking are well known and have been proven by many studies; the need for the public to be able to use PRoWs safely has been highlighted by the covid-19 pandemic, and yet their continued existence seems to be taken for granted. But unless steps are taken to restore the network at least to the condition it was in before the austerity campaign began, many PRoWs will deteriorate to the point that they will become unusable, and indeed this has already happened to far too many of them.

The Slow Ways project, which we enthusiastically support, seeks to get the public out walking on the PRowS which connect local communities together. This is just the kind of initiative which should greatly reduce the number of car journeys taken, and thus contribute significantly to achieving the objectives of the Council's Climate Change plan, but it will also put vastly increased pressure on our PRowS, and may even lead to accidents unless something is done urgently to address the lamentable deficiencies in or network of PRowS.

We note that there is no mention of PRowS in CP (Council Policy, presumably?) 52 in Appendix 1. This "seeks to maximise the retention and enhancement of Wiltshire's green infrastructure"; what could be greener than its extensive network of PRowS? CP 53 "seeks to safeguard the historic routes of Wiltshire's canal network with a view to its long-term re-establishment as navigable routes". Whilst this is indeed a laudable objective, this network is a microcosm of the RoW one, which seems to have somehow avoided any mention in the Plan. CP63 is that "Packages of integrated transport measures will be identified in Chippenham, Trowbridge and Salisbury", with the first of these to "consider the implementation of...new and improved networks of routes for pedestrians and cyclists". This is all well and good, but how about considering the thousands of miles of such networks outside these towns?

The Plan's **Emerging Spatial Strategy's** side document is its **Empowering Rural Communities** paper, and both are supported by the **Transport Review** undertaken by Atkins. We have no specific comments to make on these papers, other than to request that developers should be required to pay due care and attention to PRowS affected by their plans, rather than treating them as an irritating distraction to be considered only as an afterthought. Ideally, of course, they should be required not only to retain PRowS but to improve them if at all impossible, and to ensure that they continue to connect with the rest of the PRow network. Paragraphs 59 to 69 of the **Empowering Rural Communities** paper deals with Neighbourhood Plans. We believe that these should be required to consider how to maintain and enhance the PRowS within their jurisdiction.

Paragraph 3.2 of the **Transport Review** discusses the 'Walking and Cycling mitigation measures' to be adopted in the three largest communities of Chippenham, Trowbridge and Salisbury, however walking as a stand alone

activity is not mentioned at all. The intention seems to be that walkers will share the urban, tarmac cycling routes with cyclists, but this has safety implications. As a minimum, there need to be clearly marked lanes for cyclists and pedestrians to use, with both being wide enough (at least 1.5 m) to lessen the risk of collisions. Furthermore we think that it should be a requirement for the local authority to erect signs along such routes reminding cyclists to ring their bells or alert walkers to their approach, which should reduce the likelihood of accidents occurring.

We note that the creation of cycle tracks in urban areas can cost several million pounds, and wonder why some of this funding could not be spent on maintaining and improving the county's PRowS instead?

Appendix D1 of this review consists of a plan of the proposed Melksham bypass. The Ramblers were consulted recently by a Transport Planner working in a team delivering 'GG142 Walking, cycling and horse-riding assessment' of the bypass plan, and our comments are attached as an appendix to this response. We are anxious that these are fully considered well before the scheme is finalised. We strongly recommend that the Plan should make it clear that major transport infrastructure schemes should not allow major highways and railways to divide communities unless suitable crossing points are provided to retain the coherence and unity of local communities.

Finally we set out below our comments on the individual **Planning for...** papers for some of the principal towns in Wiltshire. Please note that the absence of comment on the housing site proposals for some of the towns should not be taken as implying that we necessarily agree with them.

Our comments relate to the sites which have been designated as potentially suitable for housing development during the Plan period. We are not commenting on the other aspects of the Plan.

Planning for Marlborough

Site 1. No objection.

Site 2. No objection provided the higher ground is retained as open space, as is the case with the existing Salisbury Road development which it adjoins.

Sites 3 & 4. With the exception of that part of Site 3 which is included in the Marlborough Neighbourhood Plan we do not consider these sites suitable for development and therefore object to their inclusion. There would be an adverse impact on the whole of bridleway PRES32 as well as parts of MARL1 and PRES27 (the White Horse Trail). PRES32 affords good views across the valley to Granham Hill. The sites' elevation means that housing development would be a prominent and unattractive feature in views from south of the A4, looking north towards the downs.

Planning for Royal Wootton Bassett

Site 3 – Maple Drive. With the exception of the square field immediately north of the school playing fields (SHELAA 3160), on which development may be acceptable, we object to the inclusion of this site. It is unsuitable for development by reason of its proximity to Jubilee Lake and the surrounding woodland. Footpath WBAS108, which runs down the western boundary and gives excellent views to the west from its elevated position, has a strong rural feel and one section is notable for its variety of wild flowers in summer.

Site 4 – Whitehill Lane. No objection provided the northern part of the site is reserved for a town park as set out in the Royal Wootton Bassett Neighbourhood Plan.

Sites 5 & 7 – South of RWB. We object to the inclusion of these two sites. The Wilts & Berks Canal when fully restored should continue to run through the countryside as it always did and should not become an urban waterway. The inclusion in Site 5 of land west of Breach Lane, which is at a higher level, would also have an adverse impact on the countryside.

Another important consideration is that, to be sustainable, any housing development south of the railway would need additional pedestrian and cycle routes to be created across the line. The electrification of the line has made the construction of new bridges more difficult. As an example of this we understand that Network Rail wish to close the surface crossing on footpath WBAS28 and have said that the gantries prevent a footbridge being put in here. We believe there is a strong case for treating the railway line as the southern boundary of the town's development area, with the exception of sites immediately adjoining Marlborough Road.

We have no objection to the remaining sites.

Planning for Tidworth and Ludgershall

The documents state that, of 1555 additional homes assessed as being needed in these two towns in the period up to 2036, only 165 require new land to be identified. Since this number is so small we do not understand why so many sites have been included.

Site 1. The northern edge of this site touches the boundary of the AONB. The ground levels are also higher than the developed area of the town to the south. We therefore believe that any development should be restricted to the southern part of the site.

Site 4. Given the relatively small number to new homes to be accommodated, as referred to above, we see no justification for including a site which covers such a large area of countryside. Any development on this site should be restricted to the north-east corner of the site, close to the A342. Development of the rest of the site would be disproportionate to the size of Ludgershall and would deprive many residents of easy access to countryside walking.

Site 5. No objection subject to the woodland being retained.

We have no objection to any of the other sites.

Planning for Salisbury

We have no specific comments on the plan, but note that the overriding impression given by it is the lack of emphasis on improvements in greener travel infrastructure, and any obvious plan to manage the inevitable increase in traffic, which is barely alluded to.

Whilst there is some evidence of thought given to pedestrian access in proposed new developments, there is no overriding guiding principle of improving the quantity and quality of footpath and cycle routes to comprise an enhanced network across the city.

Planning for North West Wiltshire

North West Wiltshire has been divided up by major roads – notably the M4, A350, A429, A420, A4 and the new north Chippenham spine road. With the proposed future Chippenham routes traffic will only increase.

The effect of the major roads is to restrict the ability to walk north to south and east to west, reducing many footpaths and bridleways to dead ends. Many of these are now obstructed, overgrown and unsigned. Parts of these major roads have no footway which prevents them being used to walk between settlements or to join up with the PRow network.

With further ‘improvements’ to trunk roads the situation can only deteriorate further. There are many large roundabouts on these routes which present significant barriers to pedestrians, cyclists and equestrians.

A429 – there is only one pedestrian refuge (at Lower Stanton St Quintin) between the M4 and Malmesbury – in 8km of road. There are only short sections of pavement, usually within settlements, so it is often impossible to walk from one to the next (as there are ditches on either side of the road).

A350 – there are pedestrian crossings only at Lacock, Frogwell (Chippenham Rugby Club), Malmesbury Road and Plough Lane – that is four safe crossings in over 12km of road. The road often has wide verges but they are mainly too rough to walk along.

A420 – there are no safe crossing points between the county boundary and the Hathaway medical centre, a distance of 11.2km. Again the road often has wide verges but they get overgrown in summer and as a result become impassable.

A4 – there is no footway between Corsham and Chippenham, a distance of 2.3km. On the Pewsham Way bypass, the pedestrian refuges do not align with the rights of way; between Stanley Lane (access to Abbeywood School) and the new pedestrian crossing at Derry Hill, there are no safe crossing points, a distance of 3.3km. There is a footway between Pewsham and Derry Hill and on to Calne, but it changes from one side of the road to the other at Chilvester Hill with no safe crossing, and there is a missing section between Greenacres Way and Springfields Academy, a distance of 170m). There is a footway along most of the A4 from Calne to Beckington, except for a 730m section north of the White Horse plantation. The footway from BANES County boundary into Box is missing a 0.5km section through Box Hill. It then resumes to Corsham.

The first section of the North Chippenham Spine road crosses three footpaths, and it was only through campaigning that one pedestrian refuge was created on the route.

The M4 is crossed or underpassed by 12 roads, 6 bridleways, 2 footpaths and 1 track. It truncates 4 bridleways, 7 footpaths and 1 cycleway. Some footpaths have been rerouted to other crossings, leading to 3 diversions of over a kilometre, and one of 2 km.

RWB64b

Appendix to Wiltshire Ramblers comments on Wiltshire Local Plan

General requirements

1. All current Rights of Way (RoW)s – which are numerous - to be maintained [see detail below]
2. Crossing points to have adequate bridge or underpass
3. Underpasses to have adequate drainage as land generally low lying
4. All non-vehicular routes to be tarmac where possible to protect against erosion from usage
5. Wilts & Berks Canal towpaths – actual and likely - to be linked in where possible
6. A new RoW adjacent to the bypass would be useful in linking routes N to S
7. Option 10d would be too environmentally damaging and make little sense in terms of work involved
8. RoWs to be of adequate width to allow for multipurpose use – cyclists, horse-riders and walkers
9. Stiles to be eliminated and replaced with kissing gates to allow for wider community use – this will have a positive impact on health

Specific requirements

1. Travelling from N to S, these are the RoWs crossed, which are all footpaths except where otherwise mentioned –

MELW 66, 61, 47, 26, 4 [Bridleway], 22, 23, 24, 35,

SEEN18, 13 [Bridleway], 17 [Bridleway]

MELW 42. See

<https://wiltscouncil.maps.arcgis.com/apps/webappviewer/index.html?id=43d5a86a545046b2b59fd7dd49d89d22>

for where exactly these RoWs are.

2. Footpath improvement – probably additional – from Melksham Oak school to the new estates on the east side of Melksham thereby diverting more pupils away from the unhealthy aspects of the Melksham – Devizes A365 main road
3. Traffic calming on Lower Woodrow [SE of Queenfield Farm] would be a good idea as it is a horsey area
4. A RoW link between footpath MELW26 and Bridleway MELW40 would be a good idea to enable safer circular walking
5. A linking RoW alongside the new road bridge from north of Beanacre would be a very useful W-E link in the north

Observations

1. Somewhere in the blurb on one of the options it mentions about 1 bridge being required. This is not correct. There are at least 3 – being the crossing of the line of the Wilts & Berks Canal – probably just to the south of Queenfield Farm. The canal is being restored. Then Clackers Brook to the east
2. There is likely to be a wiggle in the bypass at Sandridge to pass between two sets of main farm buildings – Blackmore and Manor. To go east Manor Farm would involve going over higher ground and much earth relocation as well as slicing through a solar farm
3. Suggest further dialogue with Melksham Without PC