

Strategic Environmental Assessment (SEA) of the North Bradley Neighbourhood Plan

Environmental Report to accompany the submission
version of the Neighbourhood Plan

North Bradley Parish Council

July 2019

Quality information

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Non-Technical Summary

Introduction

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging North Bradley Neighbourhood Plan (NBNP).

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the North Bradley Neighbourhood Plan seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.

The Environmental Report has been submitted to Wiltshire Council alongside the Neighbourhood Plan for subsequent Independent Examination.

Structure of the Environmental Report / this NTS

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
2. What are the SEA findings at this stage?
 - i.e. in relation to the Draft Plan
3. What happens next?
 - What steps will be taken to finalise (and monitor) the Plan?

Each of these questions is answered in turn below. Before answering the first question however, two initial questions are answered in order to further set the scene – i) what is the Plan seeking to achieve?; and ii) what is the scope of the SEA?

What is the Strategy trying to achieve?

The vision for the Neighbourhood Plan area is as follows:

“By 2026 North Bradley will have retained its landscape setting, including its physical separation from Trowbridge and its own distinct character. Local wildlife will have been protected and will be thriving.

The Parish will have secured benefits from development, including the Ashton Park Strategic Site and the Elm Grove Farm site proposed in the Housing Sites Allocations DPD, in terms of provision of new and upgraded infrastructure. New sites will have become integrated and functioning parts of the Parish.

Necessary housing will have been provided and local facilities, including pubs and shops and recreational and open space will have been preserved or added. The Parish will be cleaner and, where possible, provide a better habitat for nature. There will be an improved and better maintained transport network including foot and cycle paths and speeding vehicles will have been reduced and pedestrian safety improved.”

To achieve this vision, the following objectives have been identified:

- 1) *To preserve the rural setting and identity of North Bradley, in particular the open spaces between the village and Trowbridge, but also existing cherished green open spaces.*
- 2) *To allow the community to grow and develop in a sustainable way, with new housing and matching infrastructure.*
- 3) *To improve transport for residents including;*
 - i. *Reduced vehicle speeds*
 - ii. *Improving parking*
 - iii. *Improving sustainable transport including bus services and the creation and maintenance of the network of paths and cycle-ways*
- 4) *To influence the detailed planning of development, to ensure the Parish community benefits in terms of improved infrastructure.*
- 5) *To encourage and support community facilities such as shops, pubs, places of entertainment and leisure and new and existing open space.*
- 6) *To protect and improve the natural and built environment in terms of habitat for wildlife but also the living environment for people in terms of litter and cleanliness.*
- 7) *To enhance and protect where appropriate community facilities and assets, for example recreation areas, and to provide a site for a new non-denominational burial ground within the Parish.*

What is the scope of the SEA?

The scope of the SEA is the sustainability issues and objectives that should be a focus of (and provide a broad methodological framework for) the SEA. The SEA Framework presents the sustainability objectives established through SEA scoping, developed through a consideration of the key issues. Taken together, the sustainability themes and objectives provide a methodological 'framework' for undertaking the assessment.

The SEA Regulations require that "*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*". In England, the consultation bodies are the Environment Agency, Historic England and Natural England.¹ As such, the Scoping Report was released to these authorities for consultation between the period 19th September 2018 and 24th October 2018.

Responses were received from both Natural England and Environment Agency, and as a result of the comments, another sustainability objective was identified within the SEA Framework for the SEA theme of 'biodiversity'. No comments on the Scoping Report were received from Historic England.

The SEA Framework is presented in Chapter 3 of the main body of the Scoping Report, and presented under the following eleven themes:

- Biodiversity
- Land and soil resources
- Water resources and flood risk

¹ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected "by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes".

- Climate Change
- Historic environment
- Landscape
- Population and housing
- Community wellbeing and health
- Service centre provision (including education)
- Transport
- Economy and enterprise

Plan-making / SEA up to this point

Plan-making for the NBNP has been underway since 2015. Initial work in year 1 prepared a consultation strategy and early engagement began in year 2. Consultation has incorporated a number of informal and formal consultation exercises carried out by the Neighbourhood Plan Steering Group, including on the scope of the Neighbourhood Plan.

Housing numbers to deliver through the Neighbourhood Plan

The Wiltshire Core Strategy has set the parameters for growth in and around Trowbridge. Core Policy 29 identifies that outside of Trowbridge (a Principal Settlement) 165 dwellings are to be provided in the rest of the Community Area (and North Bradley is part of the wider Trowbridge Community Area). Approximately 5,860 dwellings are directed towards Trowbridge – including at the proposed Ashton Park Urban Extension. An additional 950 dwellings are planned at Trowbridge towards the end of the plan period once improved secondary school provisions are in place.

Ongoing work by Wiltshire Council in the Housing Supply Statements of November 2017 and March 2018 identify that the residual requirement for the further 165 homes in the Community Area has already either been delivered or is committed (has planning permission). Therefore, there is no residual requirement for the NBNP to allocate any further development sites.

The emerging HSAP however identifies that additional housing over and above that allowed for in the Wiltshire Core Strategy is required for the following reasons:

- To maintain an adequate housing land supply in accordance with Government requirements over the remaining plan period (i.e. until 2026) and reflecting the need expressed in Core Strategy for an additional 950 homes to be found for the needs of Trowbridge
- To support the role of Trowbridge as a Principal Settlement
- To reflect a shortfall of 1,220 dwellings at the Ashton Park Strategic Allocation compared to that planned for in the Core Strategy (the shortfall is expected to be delivered post 2020 and thus falls outside of the Plan period)
- To ensure that land allocated is capable of development within the plan period to meet other objectives

This need to deliver new housing, including in the identification of Trowbridge requirements through the HSAP, also needs to be balanced with a core objective of the NBNP to “*preserve the rural setting and identity of North Bradley, in particular the open spaces between the village and Trowbridge*”.

A Housing Needs Survey (HNS) was undertaken as part of the NBNP process to establish if there was a proven local need for affordable housing in the parish. The results of this indicated a need for one affordable home. In order to meet this need, an allocation of 5 homes would be required (based on the prevailing rate of 30% and the minimum threshold of 5 applying in the Trowbridge Area). However, the HNA identifies that this need is based over a three year time period, and scaling this up to cover the plan period to 2026 would increase this need to 3 affordable homes, and the number of units required to deliver this to 10.

This need for affordable homes is also being considered alongside a need for market homes. This is to meet the needs of the community (this demand was clearly expressed in the HNS), to create flexibility and demonstrate 'positive planning', and to support the delivery of new infrastructure within the Plan area (through development contributions). In view of these concerns, a buffer of 100% was added, bringing the identified requirement to 20 homes (as an indicative ideal minimum number).

Whilst it was considered that this need could be met through windfall housing supply, recent windfall data indicates that previous windfall sites all delivered less than 5 homes, meaning that no affordable housing was delivered. As such, it was felt that relying on windfall alone may not meet the affordable housing need for the Plan area.

As such, it is established that the plan will seek to allocate sites to meet these localised needs, and in doing so explore reasonable alternatives for the location of this growth.

Establishing the reasonable alternatives for the location of growth

As the minimum level of growth for the NBNP has been established, the main focus for the plan is the location of growth, where reasonable alternatives can be identified. In terms of considering local sites, the NDP team has carried out a site selection process of its own, based on consideration of:

- An appraisal of HSAP sites.
- Assessment of Strategic Housing and Employment Land Availability Assessment (SHELAA) sites; and
- Suggestions from the community.

HSAP sites

The HSAP proposes three housing allocations that fall either wholly or partially within the NBNP area, which are proposed to support the needs of Trowbridge. The sites are as follows:

- Site H2.1: Elm Grove Farm
- Site H2.2: Land off A363 off White Horse Business Park
- Site H2.6: Land South of Trowbridge/ 'Southwick Court'

It should be noted that one of these HSAP sites (H2.2 Land off A363 off White Horse Business Park) is considered to directly conflict with the core NBNP objective to "*preserve the rural setting and identity of North Bradley, in particular the open spaces between the village and Trowbridge*". The Parish Council have been consulting with Wiltshire Council to seek to reduce the extent of this development², and thus its impact on the strategic gap between Trowbridge and North Bradley.

² The allocation has been reduced from 225 to 175 as a result of this consultation with Wiltshire Council (identified within the HSAP 'Schedule of Proposed Changes' Consultation Document September 2017).

SHELAA sites

Sites from the SHELAA that would comply with the National Planning Policy Framework (NPPF) by being shown by Wiltshire Council as; suitable, available, achievable, and deliverable were selected.

The SHELAA sites selected were:

- Site 261: Land at Lower Biss Farm
- Site 613: Land south/ south-west of Trowbridge³
- Site 298: South/ south-west of Trowbridge⁴
- Site 322: Park Farm (whilst this was shown as not deliverable in the SHELAA, further review has confirmed availability and deliverability has been established in correspondence with Wiltshire Council)⁵
- Site 672: Paddock at Little Common Lane (confirmed as available and deliverable by Wiltshire Council⁶ though shown otherwise in SHLAA draft in error)
- Site 1040: 54 Woodmarsh (Wiltshire Council could not confirm this site as available, however, it is considered as an 'aspirational' site worthy of further surveying by virtue of potential future availability - particularly in a future plan review)

The site selection process for the HSAP included a review of the sites that had previously been in the SHLAA, and this review has identified that Site 261 (Land at Lower Biss Farm) should be excluded on the basis of likely harm to bats from the Avon Bats Special Area of Conservation (SAC). Therefore, this site has not been taken forward for any further assessment.

Local community suggestions

During the site selection process, the Steering Group were contacted by two developers; the owner of the Park Farm site (SHELAA site 322) confirming availability of the site, and the promoter of another site – Organ Pool Farm. Organ Pool Farm is being promoted by the developer for housing and a village shop.

The long list of sites

The full list of sites that are therefore considered for allocation within the NBNP is presented in **Table 1** below. The North Bradley Site Selection Report identifies that an indicative figure of 30 dwellings per hectare is used to assess possible capacities of the sites, unless capacity is provided through the HSAP.⁷

³ This is also the HSAP site H2.1 Elm Grove Farm

⁴ This is also the HSAP site H2.2 Land off A363 off White Horse Business Park

⁵ See Site Selection Report for further details

⁶ Ibid.

⁷ Based on HMA evidence – see Site Selection Report for further details

Table 1: Long list of site options for the NBNP

SHELAA / SHLAA Ref	HSAP Ref	Site Name	Indicative housing numbers
298	H2.2	Land off A363 off White Horse Business Park(South/ south-west of Trowbridge in the SHELAA)	175
322		Park Farm	94
613	H2.1	Elm Grove Farm (Land south/ south-west of Trowbridge in the SHELAA)	200 (as allocated in HSAP)
672		Paddock at Little Common Lane	18
1040		54 Woodmarsh	34
3565	H2.6	Land south of Trowbridge / 'Southwick Court'	180 (as allocated in HSAP)
N/A		Organ Pool Farm, Southwick Road, North Bradley	120

For the purposes of the SEA, the site options are all considered as reasonable alternatives for the location of growth in the NBNP area at this stage of the assessment.

Findings of the alternatives assessment

Table 2 below presents summary assessment findings for the alternatives identified. For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make certain assumptions regarding how options will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.⁸ So, for example, account is taken of the duration, frequency and reversibility of effects.

⁸ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Table 2: Summary alternatives appraisal findings

SEA Theme	1. Land off A363 off White Horse Business Park	2. Park Farm	3. Elm Grove Farm	4. Paddock at Little Common Lane	5. 54 Woodmarsh	6. Southwick Court	7. Organ Pool Farm
Biodiversity	6	3	5	1	2	7	4
Land and soil resources	5	3	7	1	2	6	4
Water resources and flood risk	1	1	1	1	1	2	1
Climate Change	5	3	7	1	2	6	4
Historic environment	3	1	2	2	2	1	1
Landscape	3	1	3	1	1	2	1
Population and housing	3	5	1	7	6	2	4
Community wellbeing and health	2	1	3	1	1	3	1
Service centre provision (including education)	1	3	6	5	4	6	2
Transport	1	2	?	2	2	?	2
Economy and enterprise	1	4	2	3	3	5	4

Summary findings:

The assessment has highlighted the potential for significant negative effects to arise relating to the following key issues:

- HRA screening of a site nearby to Site 1 and Site 6 (17/03269/OUT) has identified that development in this location could adversely impact on the Bath and Bradford on Avon SAC, which provides a home to a number of rare and protected species of bat, including Bechstein’s bat. The screening identifies that any medium-scale growth in the area is likely to lead to disturbance. Development at sites 1, 2, 3, 6 and 7 is therefore considered to have the potential for significant negative effects on biodiversity and further ecological assessment will be required prior to development.
- The western half of Site 6 (Southwick Court) is located partially within Flood Zones 2 and 3 (predominantly 3) which surround the Lambrok Stream. Whilst development could avoid flood risk areas around the northern border of the site, the stream runs

north-south through the site which may make mitigation more difficult – particularly considering future flood risk as a result of climate change. Development also has the potential to affect the water quality of the stream, and it is recommended that Sustainable Drainage Systems are required for development to minimise impacts associated with surface water run-off. In light of these findings, the site is identified for a potential significant negative effect; though it is recognised that mitigation or a reduced allocation site size may be able to reduce this to a residual minor negative effect or alleviate effects respectively.

- Site 1 (Land off A363 off White Horse Business Park) contains designated heritage assets located in the burial ground of the former Baptist Chapel. These include the Grade II Listed 'Two Monuments in Burial Ground of Former Baptist Chapel' and the Grade II Listed 'Gateway to Burial Ground of Former Baptist Chapel'. The site is also adjacent to two further Listed Buildings (Kings Farmhouse and Willow Grove). Development therefore has the potential to affect the designated heritage assets and their settings. Mitigation will be required to reduce the extent of the potential negative effects; and it is considered that development also has the potential to enhance the setting of the designated heritage asset. The potential effects of development are ultimately dependent upon design, and layout and lower level assessments. It is recommended that policy requires a heritage impact assessment and mitigation strategy prior to any development. Taking a precautionary approach it is considered appropriate to identify at this stage however the potential for significant long term negative effects on the historic environment.
- Development at Site 3 is considered to avoid encroachment through its enclosure by existing development. However, if built out the site would extend the built form of Trowbridge so as to envelop White Horse Business Park. This would create an urban extension of Trowbridge wrapping around the north and east of North Bradley. Development at Site 1 would also close the landscape gap that separates the village from White Horse Business Park, and the implications this has for the 'villagescape' are significant. Furthermore, if both Site 1 and Site 3 are developed, the cumulative effects would result in amalgamation with Trowbridge through a complete loss of landscape gaps in the east of the village; it is therefore considered that there is the potential for significant negative cumulative effects on the landscape.
- Historic England has raised concerns in relation to the level of development at Site 4, which could affect designated heritage assets close by. As such, at this stage it is recognised that there is the potential for a significant negative effect. Mitigation such as a reduced level of development and appropriate design and layout may reduce the extent of these potential effects.
- Development at Sites 1, 3 and 6 will significantly reduce the presence of open space in the north of the Plan area. This is likely to negatively affect community health and wellbeing in terms of access to the countryside and areas of open space for recreation. At Sites 3 and 6 this is also considered likely to extend the effects to the local community of Trowbridge who are also likely to rely on this space for recreation and access to natural spaces. As such, it is considered that development at these sites has the potential for significant long term negative effects without significant mitigation in the form of on site provisions of natural spaces.

The assessment identifies that housing growth will support residents in the long term by meeting local housing needs, and the positive effects are of greater significance at Sites 1, 2, 3, 5, 6 and 7. The assessment has also identified significant potential to positively affect local transport and accessibility through development at Site 1 which could connect the village more directly and more sustainably with White Horse Business Park.

Overall, whilst the larger site options (Sites 1, 3 and 6) perform better in terms of delivering

housing numbers and supporting the wider Community Area housing needs (particularly those of Trowbridge) and delivering new infrastructure, this has to be considered in terms of the wider context. The housing would be provided in an area subject to significant constraints, such as protected bat species which are affected by the cumulative effects of growth. Large scale growth opposes community aspirations for smaller sites, and there are localised impacts in site allocations in retaining a separate identity from Trowbridge. Larger growth is also considered to increase the potential for, or extent of, negative effects associated with: the efficient use of land and protection of soil resources; surface water run-off; impacts on local highways networks and the associated effects on air quality; and the loss of open land for recreation. The potential for significant negative cumulative effects on the landscape and village identity are also identified should both Site 1 and Site 3 be bought forward for development.

Given the ecological sensitivity of the Plan area, it is recommended that development proposals for any of the site options are accompanied by ecological impact studies and mitigation strategies that contribute to the wider aims of bat species preservation.

It is considered that small scale growth that integrates with the settlement however can support improvements to transport infrastructure, and maximise opportunities to enhance active travel within the NBNP area. Small scale growth focused around the existing settlement area (achievable at Sites 2, 4, 5 and 7) could allow the settlement to grow sustainably, without detracting from the character and identity of the village or the wider setting of the Parish.

The preferred approach

Following a review of the evidence and consideration of community aspirations for the area, the NBNP proposes to allocate one site, as follows:

- 54, Woodmarsh (SHELAA Site 1040, referred to as Site 5 in the SEA of reasonable alternatives) for the development of 25 homes, 8 of which will be affordable homes.

The Parish Council have identified the following reasons for not considering the remaining site options for allocation in the NBNP:

SHELAA / SHLAA Ref	SEA Ref	Site Name	Reasons for non-progression in NBNP
298	1	Land off A363 off White Horse Business Park	The site is allocated within the emerging Wiltshire Housing Site Allocations Plan (HSAP) – Site H2.2
322	2	Park Farm	The site is not supported by the local community
613	3	Elm Grove Farm	The site is allocated within the emerging HSAP – Site H2.1
672	4	Paddock at Little Common Lane	Access issues and heritage constraints that would need to be overcome. Potential for re-consideration of the site in the next Plan review if demonstrated that these issues can be overcome.
3565	6	Southwick Court	The site is allocated within the emerging HSAP – Site H2.6
N/A	7	Organ Pool Farm	<ul style="list-style-type: none"> The site is not supported by the local community; The site is too large considering local needs and is not a strategic site aimed at meeting the needs of Trowbridge; The large scale of development proposed at the site is considered inappropriate in terms of the limited existing facilities and infrastructure and there are concerns over the viability of development bringing forward sufficient improvements or new provisions; and The large scale of development is considered inappropriate in terms of the cumulative effects of development on bat species.

Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the submission version of the Neighbourhood Plan. Assessment findings are presented as a series of narratives under the 'SEA framework' themes. The conclusions and recommendations are provided below.

Conclusions and recommendations

Overall the appraisal of the NBNP has not identified the potential for significant negative effects. The SEA themes which are most sensitive to development in the NBNP area are biodiversity and landscape.

In terms of biodiversity a key concern is the cumulative effect of development on bat species and the Bath and Bradford on Avon SAC; however the appraisal has identified that policy provisions are likely to ensure that development will not lead to any significant negative effects in this regard. Higher level monitoring of the effects of development on bat species

will also support the ongoing management of these key biodiversity features. More broadly in relation to biodiversity, the NBNP seeks to deliver enhancements to the Neighbourhood Plan area's habitats and ecological networks through delivering an overall net biodiversity gain at development sites.

In terms of landscape, a key concern is the open gap in the north of the Plan area which provides separation between North Bradley and Trowbridge and is integral to local distinctiveness. Considering the development proposed in the north of the Plan area through the HSAP, there is concern over the cumulative effects of development on this strategic landscape gap. The NBNP proactively tackles this issue with a spatial strategy that does not undermine the gap, and policy proposals that seek to retain the gap and support landscape character.

Minor negative effects are identified as a result of the small scale loss of greenfield land and soil resources at the development sites.

The potential for significant positive effects are identified for the SEA themes of population and housing, community wellbeing and health, and transport. This largely relates to the delivery of new development, including: new housing which supports localised needs – particularly in terms of housing type; policy provisions which provide protection for local green spaces and recreation; support for new community facilities such as a burial ground to meet local needs; and the provision of improvements to sustainable transport networks – including the enhancement of active travel opportunities.

Overall it is considered that the NBNP takes a proactive approach to delivering new development whilst protecting key aspects of the natural and built environment that contribute to the overall quality of place and living in this area. The NBNP seeks to proactively address the cumulative effects arising from implementation of the HSAP alongside the NBNP and seeks to reduce the potential for negative effects in this respect, whilst maximising the potential for positive effects arising.

Next steps

Plan finalisation

This Environmental Report accompanies the North Bradley Neighbourhood Plan for submission to the Local Planning Authority, Wiltshire Council, for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the adopted Wiltshire Local Planning Framework; it is recognised that this is likely to be the extant Core Strategy, however at this stage this could also include the emerging Housing Site Allocations Plan.

If the subsequent Independent Examination is favourable, the North Bradley Neighbourhood Plan will be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the North Bradley Neighbourhood Plan will become part of the Development Plan for Wiltshire, covering the defined Neighbourhood Plan area.

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1. Introduction

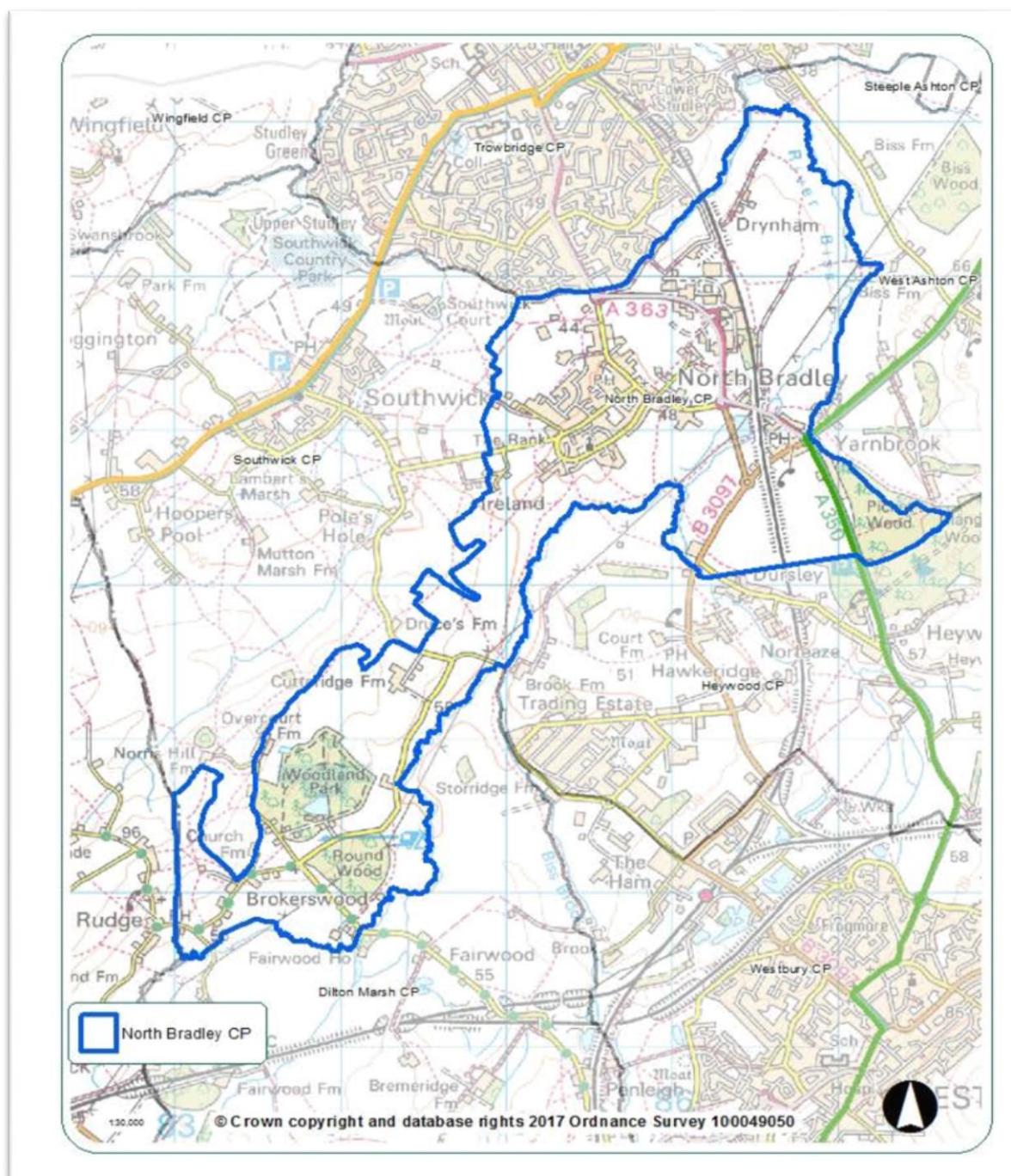
Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging North Bradley Neighbourhood Plan (NBNP).
- 1.2 The NBNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The NBNP is being prepared in the context of the adopted Wiltshire Core Strategy (2015) and the emerging Wiltshire Housing Site Allocations Plan, and the Wiltshire Local Plan Review (LPR) - including the Swindon and Wiltshire Joint Spatial Framework (JSF).
- 1.3 The NBNP was submitted to Wiltshire Council in July 2019. This Environmental Report accompanies the submitted version of the Neighbourhood Plan.
- 1.4 Key information relating to the NBNP is presented in Table 1.1 below:

Table 1.1 North Bradley Neighbourhood Plan – Key Facts

Name of Responsible Authority	North Bradley Parish Council
Title of Plan	North Bradley Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The North Bradley Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with Wiltshire Council's adopted Core Strategy (2015) and emerging Wiltshire Housing Site Allocations Plan and Wiltshire Local Plan Review including the Swindon and Wiltshire Joint Spatial Framework.</p> <p>The North Bradley Neighbourhood Plan will be used to guide and shape development within the North Bradley Neighbourhood Plan area.</p>
Timescale	2018 - 2026
Area covered by the plan	The Neighbourhood Plan area covers the parish of North Bradley in Wiltshire (Figure 1.1)
Summary of content	The North Bradley Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	<p>██████████ Clerk to North Bradley Parish Council</p> <p>Email: parishcouncil@northbradley.org.uk</p>

Figure 1.1: North Bradley Neighbourhood Plan Area



SEA explained

- 1.5 The North Bradley Neighbourhood Plan has been screened in by Wiltshire Council as requiring an SEA due to the potential for significant environmental effects from site allocations within the Neighbourhood Plan area.
- 1.6 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the North Bradley Neighbourhood Plan seeks to

maximise the emerging Neighbourhood Plan's contribution to sustainable development.

- 1.7 The SEA has been prepared in conformity with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive⁹. This has included an initial scoping stage, consulted upon with Statutory Consultees; Natural England, Historic England and Environment Agency.¹⁰
- 1.8 The SEA Regulations require that a report (known as the **Environmental Report**) is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.9 More specifically, the Report must answer the following three questions:
 1. What has plan-making/ SEA involved **up to this point**?
 - Including in relation to 'reasonable alternatives'
 2. What are the appraisal findings **at this stage**?
 - i.e. in relation to the draft plan.
 3. What happens **next**?
- 1.10 This report essentially answers questions 1, 2 and 3 in turn, in order to provide the required information.¹¹ Each question is answered within a discrete 'part' of the report. Before answering Q1, two initial questions are answered in order to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

⁹ Directive 2001/42/EC

¹⁰ Further information on the scope of the SEA is provided in Chapter 3

¹¹ See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information

2. What is the plan seeking to achieve?

Relationship with the Wiltshire Local Plan

- 2.1 The NBNP is being prepared in the context of the adopted Wiltshire Core Strategy (2015) and the emerging Wiltshire Housing Site Allocations Plan (HSAP), and the Wiltshire Local Plan Review (LPR) - including the Swindon and Wiltshire Joint Spatial Framework (JSF). The adopted Core Strategy sets the development framework for Wiltshire covering the time period up until the year 2026.
- 2.2 It is important to note that until the emerging LPR and HSAP are adopted, the Core Strategy will continue to provide the strategic Local Development Plan for the parish. The NBNP must be in general conformity with the strategic policies of the Local Development Plan, supplementing these with locally specific policies as appropriate.
- 2.3 The draft HSAP and supporting evidence was submitted in July 2018 to the Secretary of State for examination. Following receipt of a procedural letter from the Inspector in August 2018, Wiltshire Council are currently undertaking further consultation on a 'Schedule of Proposed Changes' to the Plan, and its accompanying updated evidence documents. It is expected that formal public hearing sessions will commence in November 2018.
- 2.4 The LPR is at an early stage of preparation. An initial consultation between November and December 2017 sought to gauge stakeholder and public opinion about the issues that the LPR should address in order to plan for the period to 2036, and two documents were released for this consultation; the Wiltshire Local Plan Review Consultation Paper, and the Swindon and Wiltshire Joint Spatial Framework Issues Paper.
- 2.5 The Wiltshire Core Strategy identifies North Bradley as a Large Village within the Trowbridge Community Area. Large Villages are defined as settlements with a limited range of employment, services and facilities where development "*will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities*".
- 2.6 Within the Trowbridge Community Area, the Principal Settlement is Trowbridge, with Hilperton and Southwick also identified as Large Villages in this Community Area. There are also two identified Small Villages; West Ashton and Yarnbrook.
- 2.7 Within the Trowbridge Community Area (under Core Policy 29) 25ha of new employment land and approximately 6,975 new homes will be provided over the plan period 2006 – 2026. Approximately 5,860 dwellings are directed towards Trowbridge – including at the proposed Ashton Park Urban Extension. An additional 950 dwellings are planned at Trowbridge towards the end of the plan period once improved secondary school provisions are in place. The remaining 165 dwellings are to be provided in the rest of the Community Area.
- 2.8 Further to this, the Core Strategy identifies the following key issue for this community area:

"it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning"

Ongoing work by Wiltshire Council in the Housing Supply Statements of November 2017 and March 2018 identify that the residual requirement for the further 165 homes in the Community Area has already either been delivered or is committed (has planning permission). Therefore, there is no residual requirement for the NBNP to allocate any further development sites.

Vision, aims and objectives of the North Bradley Neighbourhood Plan

2.9 As discussed above, there is no requirement for the NBNP to allocate land for new homes. However, there is a need to consider taking a positive approach to the allocation of land for development nonetheless, recognising the potential benefits that might be realised.

2.10 The NBNP has in reviewing evidence and considering the wishes of the local community identified the following vision for North Bradley:

“By 2026 North Bradley will have retained its landscape setting, including its physical separation from Trowbridge and its own distinct character. Local wildlife will have been protected and will be thriving.

The Parish will have secured benefits from development, including the Ashton Park Strategic Site and the Elm Grove Farm site proposed in the Housing Sites Allocations DPD, in terms of provision of new and upgraded infrastructure. New sites will have become integrated and functioning parts of the Parish.

Necessary housing will have been provided and local facilities, including pubs and shops and recreational and open space will have been preserved or added. The Parish will be cleaner and, where possible, provide a better habitat for nature. There will be an improved and better maintained transport network including foot and cycle paths and speeding vehicles will have been reduced and pedestrian safety improved.”

2.11 To achieve this vision, the following objectives have been identified:

- 1) *To preserve the rural setting and identity of North Bradley, in particular the open spaces between the village and Trowbridge, but also existing cherished green open spaces.*
- 2) *To allow the community to grow and develop in a sustainable way, with new housing and matching infrastructure.*
- 3) *To improve transport for residents including;*
 - i. *Reduced vehicle speeds*
 - ii. *Improving parking*
 - iii. *Improving sustainable transport including bus services and the creation and maintenance of the network of paths and cycle-ways*
- 4) *To influence the detailed planning of development, to ensure the Parish community benefits in terms of improved infrastructure.*
- 5) *To encourage and support community facilities such as shops, pubs, places of entertainment and leisure and new and existing open space.*
- 6) *To protect and improve the natural and built environment in terms of habitat for wildlife but also the living environment for people in terms of litter and cleanliness.*
- 7) *To enhance and protect where appropriate community facilities and assets, for example recreation areas, and to provide a site for a new non-denominational burial ground within the Parish.*

3. The Scope of the SEA

Introduction

3.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the sustainability issues/ objectives that should be a focus of (and provide a methodological framework for) SEA. The purpose of scoping was to outline the 'scope' of the SEA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability issues for the Neighbourhood Plan; and
- An 'SEA Framework' of objectives against which the Neighbourhood Plan can be assessed.

3.2 Further information on the scope of the SEA is presented in **Appendix II**.

Consultation

3.3 The SEA Regulations require that "*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*". In England, the consultation bodies are the Environment Agency, Historic England and Natural England.¹² As such, the Scoping Report was released to these authorities for consultation between the period 19th September 2018 and 24th October 2018.

3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1** below.

¹² In line with Article 6(3) of the SEA Directive, these consultation bodies were selected "*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*".

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
<p>Natural England Charles Routh, Lead Adviser, Planning & Licencing – Somerset, Avon and Wiltshire</p>	
<p>Our main area of interest is Table 3.1. We note that the first decision aiding question is: support continued improvements to the status of internationally and nationally designated sites of significance in the vicinity of the Neighbourhood Plan area, including the Bath and Bradford on Avon Bat SAC, the Picket and Clanger Wood SSSI and the Steeple Ashton SSSI?</p> <p>As we see it one of the main tasks of the SEA is to differentiate between policy options with respect to how they might impact on Bechstein’s and other bat species associated with the SAC. In our view the above question doesn’t articulate this issue as well as it might. Steeple Ashton SSSI is geological, so very unlikely to be impacted at distance by the Neighbourhood Plan. The features of Picket and Clanger Wood SSSI (other than bats) are unlikely to be affected differently by options in the Plan. A clearer question might be:</p> <p>‘maintain and improve the landscape for bats associated with the Bath and Bradford on Avon Bat SAC and/ or Picket and Clanger Wood SSSI?’</p>	<p>Comment noted. The suggested assessment question has been added to the SEA Framework</p>
<p>Environment Agency Ellie Challans, Planning Advisor Wessex Sustainable Places</p>	
<p>Thank you for your below email. We offer the following comments.</p> <ul style="list-style-type: none"> · Page 15 (table showing relevant plans for flood risk) – Environment Agency Flood Risk Maps – this could be split into ‘EA Flood Zones’ and ‘Flood Map for Surface Water’, to be more specific and more accurate. · Page 46 – we support the exploration of the questions raised / objectives in the first two rows of the table. 	<p>Comment Noted. Maps will be split according to recommendation in any iteration.</p>
<p>Historic England</p>	
<p>No comments received on the Scoping Report.</p> <p>NB: an additional response was received (in response to the SEA Screening Assessment) which has informed the assessment of reasonable alternatives.</p>	<p>N/A</p>

SEA Framework

3.5 The issues identified through the Scoping process were then translated into an ‘SEA Framework’. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework for the Neighbourhood Plan is presented in **Table 3.2** below.

Table 3.2: SEA Framework for the North Bradley Neighbourhood Plan

SEA Objective	Assessment questions. Will the option/proposal help to...
Biodiversity	
Protect and enhance all biodiversity and geological features.	<ul style="list-style-type: none"> • Support continued improvements to the status of the internationally and nationally designated sites of significance in the vicinity of the Neighbourhood Plan area, including the Bath and Bradford on Avon Bat SAC, the Picket and Clanger Wood SSSI and the Steeple Ashton SSSI? • Maintain and improve the landscape for bats associated with the Bath and Bradford on Avon Bat SAC and/ or Picket and Clanger Wood SSSI? • Support the status of the locally designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Land and soil resources	
Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Promote the use of previously developed land? • Direct development on greenfield sites to land not classified as the best and most versatile agricultural land?
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<ul style="list-style-type: none"> • Support the minimisation, reuse and recycling of waste? • Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? • Encourage recycling of materials and minimise consumption of resources during construction?
Water resources and flood risk	
Limit flood risk in the Neighbourhood Plan area	<ul style="list-style-type: none"> • Ensure that no inappropriate development takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?

SEA Objective	Assessment questions. Will the option/proposal help to...
Use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Minimise water consumption?
Climate Change	
Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area	<ul style="list-style-type: none"> • Reduce the need to travel via privately owned vehicle? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change	<ul style="list-style-type: none"> • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks?
Historic environment	
Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.	<ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment? • Conserve and enhance archaeological remains? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?
Landscape	
Protect and enhance the character and quality of landscapes and villagescapes.	<ul style="list-style-type: none"> • Protect and enhance the unique combination of elements and features that make local landscapes distinctive?

SEA Objective	Assessment questions. Will the option/proposal help to...
Population and housing	
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Community wellbeing and health	
Improve the health and wellbeing residents within the Neighbourhood Plan area.	<ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Align to the key priority areas outlined in the Joint Strategic Needs Assessment? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Promote the use of healthier modes of travel? • Improve access to the countryside for recreational use?
Service centre provision (including education)	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<ul style="list-style-type: none"> • Promote the development of a range of high quality, accessible community facilities? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Support educational provision in the area?
Transport	
Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure enhancements? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents from the road network?

SEA Objective	Assessment questions. Will the option/proposal help to...
Economy and Enterprise	
Promote the economic vitality of North Bradley	<ul style="list-style-type: none">• Enable and encourage key local business and employment opportunities to stay and grow in North Bradley?• Facilitate running a business from home and homeworking?

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

- 4.1 The ‘narrative’ of plan-making/ SEA up to this point is told within this part of the Environmental Report.
- 4.2 A key element of the SEA process is the appraisal of ‘reasonable alternatives’ for the NBNP. The SEA Regulations¹³ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*’.
- 4.3 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.4 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for development. Specifically, this chapter explains how the NBNP’s development strategy has been shaped through considering alternative approaches for the location of housing in the Neighbourhood Plan area.

Structure of this part of the report

- 4.5 This part of the report is structured as follows:
- **Chapter 5** – explains the process of **establishing** reasonable alternatives
 - **Chapter 6** – presents the outcomes of **assessing** reasonable alternatives
 - **Chapter 7** – explains reasons for establishing the **preferred option**, in light of the assessment.

¹³ Environmental Assessment of Plans and Programmes Regulations 2004

5. Establishing the reasonable alternatives

Introduction

- 5.1 Plan-making for the NBNP has been underway since 2015. Initial work in year 1 prepared a consultation strategy and early engagement began in year 2. Consultation has incorporated a number of informal and formal consultation exercises, including questionnaires, carried out by the Neighbourhood Plan Steering Group, including on the scope of the Neighbourhood Plan. Full details of consultation undertaken to date can be found in the Consultation Statement that accompanies the NBNP.

Housing numbers to deliver through the Neighbourhood Plan

- 5.2 As identified previously The Wiltshire Core Strategy has set the parameters for growth in and around Trowbridge. Core Policy 29 identifies that outside of Trowbridge (a Principal Settlement) 165 dwellings are to be provided in the rest of the Community Area (and North Bradley is part of the wider Trowbridge Community Area). Approximately 5,860 dwellings are directed towards Trowbridge – including at the proposed Ashton Park Urban Extension. An additional 950 dwellings are planned at Trowbridge towards the end of the plan period once improved secondary school provisions are in place.
- 5.3 Ongoing work by Wiltshire Council in the Housing Supply Statements of November 2017 and March 2018 identify that the residual requirement for the further 165 homes in the Community Area has already either been delivered or is committed (has planning permission). Therefore, there is no residual requirement for the NBNP to allocate any further development sites.
- 5.4 The emerging HSAP however identifies that additional housing over and above that allowed for in the Wiltshire Core Strategy is required for the following reasons:
- To maintain an adequate housing land supply in accordance with Government requirements over the remaining plan period (i.e. until 2026) and reflecting the need expressed in Core Strategy for an additional 950 homes to be found for the needs of Trowbridge
 - To support the role of Trowbridge as a Principal Settlement
 - To reflect a shortfall of 1,220 dwellings at the Ashton Park Strategic Allocation compared to that planned for in the Core Strategy (the shortfall is expected to be delivered post 2020 and thus falls outside of the Plan period)
 - To ensure that land allocated is capable of development within the plan period to meet other objectives
- 5.5 This need to deliver new housing, including in the identification of Trowbridge requirements through the HSAP, also needs to be balanced with a core objective of the NBNP to *“preserve the rural setting and identity of North Bradley, in particular the open spaces between the village and Trowbridge”*.
- 5.6 A Housing Needs Survey (HNS) was undertaken as part of the NBNP process to establish if there was a proven local need for affordable housing in the parish. The results of this indicated a need for one affordable home. In order to meet this need, an

allocation of 5 homes would be required (based on the prevailing rate of 30% and the minimum threshold of 5 applying in the Trowbridge Area). However, the HNA identifies that this need is based over a three year time period, and scaling this up to cover the plan period to 2026 would increase this need to 3 affordable homes, and the number of units required to deliver this to 10.

- 5.7 This need for affordable homes is also being considered alongside a need for market homes. This is to meet the needs of the community (this demand was clearly expressed in the HNS), to create flexibility and demonstrate 'positive planning', and to support the delivery of new infrastructure within the Plan area (through development contributions). In view of these concerns, a buffer of 100% was added, bringing the identified requirement to 20 homes (as an indicative ideal minimum number).
- 5.8 Whilst it was considered that this need could be met through windfall housing supply, recent windfall data indicates that previous windfall sites all delivered less than 5 homes, meaning that no affordable housing was delivered. As such, it was felt that relying on windfall alone may not meet the affordable housing need for the Plan area.
- 5.9 As such, it is established that the plan will seek to allocate sites to meet these localised needs, and in doing so explore reasonable alternatives for the location of this growth.

Establishing the reasonable alternatives for the location of growth

- 5.10 As the minimum level of growth for the NBNP has been established, the main focus for the plan is the location of growth, where reasonable alternatives can be identified. In terms of considering local sites, the NDP team has carried out a site selection process of its own, based on consideration of:
- An appraisal of HSAP sites.
 - Assessment of Strategic Housing and Employment Land Availability Assessment (SHELAA) sites; and
 - Suggestions from the community.

HSAP sites

- 5.11 The HSAP proposes three housing allocations that fall either wholly or partially within the NBNP area, which are proposed to support the needs of Trowbridge. The sites are as follows:
- Site H2.1: Elm Grove Farm
 - Site H2.2: Land off A363 off White Horse Business Park
 - Site H2.6: Land South of Trowbridge/ 'Southwick Court'
- 5.12 It should be noted that one of these HSAP sites (H2.2 Land off A363 off White Horse Business Park) is considered to directly conflict with the core NBNP objective to *"preserve the rural setting and identity of North Bradley, in particular the open spaces between the village and Trowbridge"*. The Parish Council have been consulting with Wiltshire Council to seek to reduce the extent of this development¹⁴, and thus its impact on the strategic gap between Trowbridge and North Bradley.

¹⁴ The allocation has been reduced from 225 to 175 as a result of this consultation with Wiltshire Council (identified within the HSAP 'Schedule of Proposed Changes' Consultation Document September 2017).

SHELAA sites

5.13 Sites from the SHELAA that would comply with the National Planning Policy Framework (NPPF) by being shown by Wiltshire Council as; suitable, available, achievable, and deliverable were selected.

5.14 The SHELAA sites selected were:

- Site 261: Land at Lower Biss Farm
- Site 613: Land south/ south-west of Trowbridge¹⁵
- Site 298: South/ south-west of Trowbridge¹⁶
- Site 322: Park Farm (whilst this was shown as not deliverable in the SHELAA, further review has confirmed availability and deliverability has been established in correspondence with Wiltshire Council)¹⁷
- Site 672: Paddock at Little Common Lane (confirmed as available and deliverable by Wiltshire Council¹⁸ though shown otherwise in SHLAA draft in error)
- Site 1040: 54 Woodmarsh (Wiltshire Council could not confirm this site as available, however, it is considered as an 'aspirational' site worthy of further surveying by virtue of potential future availability - particularly in a future plan review)

5.15 The site selection process for the HSAP included a review of the sites that had previously been in the SHLAA, and this review has identified that Site 261 (Land at Lower Biss Farm) should be excluded on the basis of likely harm to bats from the Avon Bats Special Area of Conservation (SAC). Therefore, this site has not been taken forward for any further assessment.

Local community suggestions

5.16 During the site selection process, the Steering Group were contacted by two developers; the owner of the Park Farm site (SHELAA site 322) confirming availability of the site, and the promoter of another site – Organ Pool Farm. Organ Pool Farm is being promoted by the developer for housing and a village shop.

The long list of sites

5.17 The full list of sites that are therefore considered for allocation within the NBNP is presented in **Table 5.1** below. The North Bradley Site Selection Report identifies that an indicative figure of 30 dwellings per hectare is used to assess possible capacities of the sites, unless capacity is provided through the HSAP.¹⁹ The sites are also presented in **Figure 5.1**.

¹⁵ This is also the HSAP site H2.1 Elm Grove Farm

¹⁶ This is also the HSAP site H2.2 Land off A363 off White Horse Business Park

¹⁷ See Site Selection Report for further details

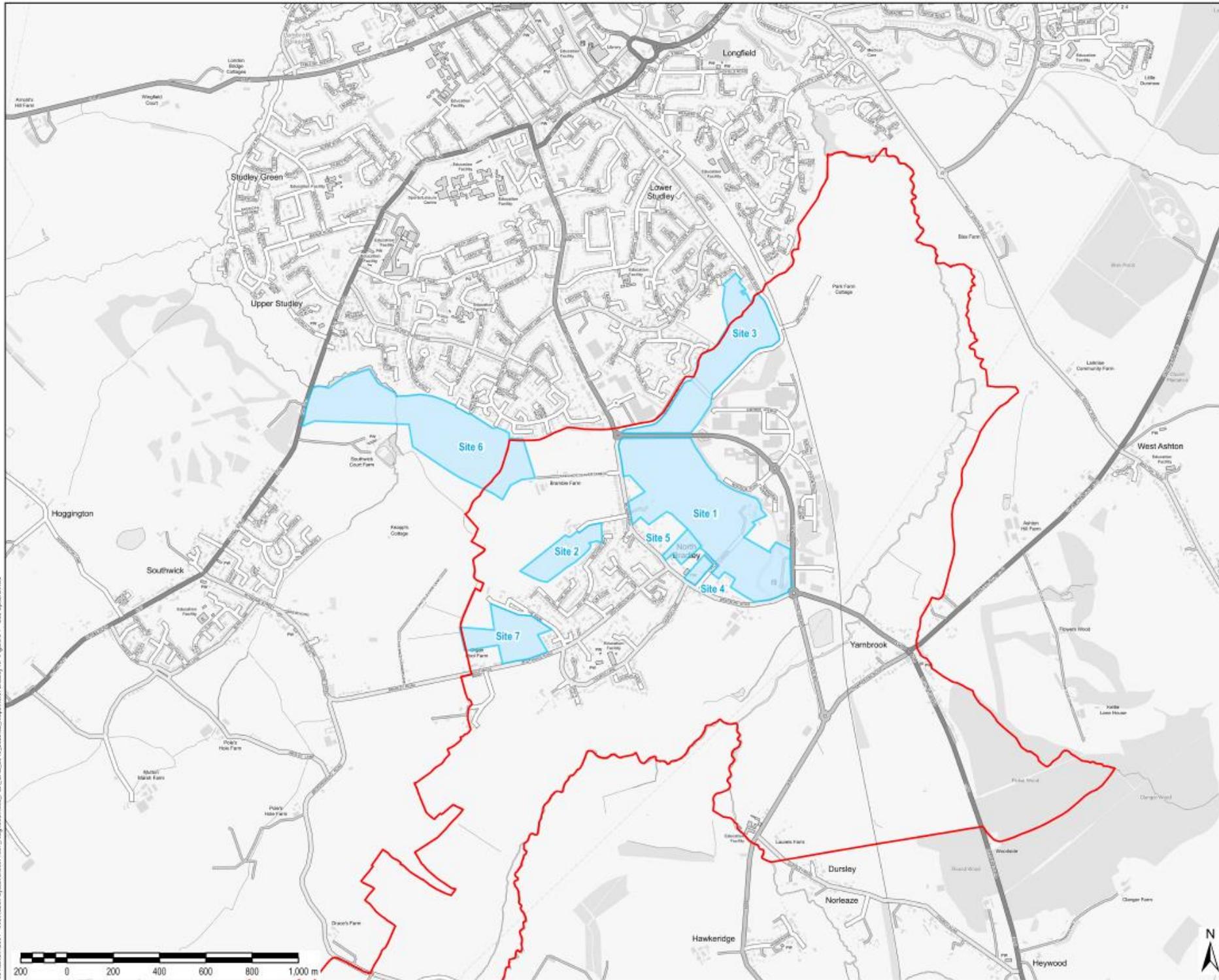
¹⁸ Ibid.

¹⁹ Based on HMA evidence – see Site Selection Report for further details

Table 5.1: Long list of site options for the NBNP

SHELAA / SHLAA Ref	HSAP Ref	Site Name	Indicative housing numbers
298	H2.2	Land off A363 off White Horse Business Park(South/ south-west of Trowbridge in the SHELAA)	175
322		Park Farm	94
613	H2.1	Elm Grove Farm (Land south/ south-west of Trowbridge in the SHELAA)	200 (as allocated in HSAP)
672		Paddock at Little Common Lane	18
1040		54 Woodmarsh	34
3565	H2.6	Land south of Trowbridge / 'Southwick Court'	180 (as allocated in HSAP)
N/A		Organ Pool Farm, Southwick Road, North Bradley	120

5.18 For the purposes of the SEA, the site options are all considered as reasonable alternatives for the location of growth in the NBNP area at this stage of the assessment.



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LEGEND

- North Bradley Neighbourhood Plan Area
- Site Option
- Site 1 Land off A363 of White Horse Business Park
- Site 2 Park Farm
- Site 3 Elm Grove Farm
- Site 4 Paddock at Little Common Lane
- Site 5 54 Woodmarsh
- Site 6 Southwick Court
- Site 7 Organ Pool Farm

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Purpose of Issue **DRAFT**

Client **NORTH BRADLEY PARISH COUNCIL**

Project Title **SEA FOR THE NORTH BRADLEY NEIGHBOURHOOD PLAN**

Drawing Title **NORTH BRADLEY NEIGHBOURHOOD PLAN SITE OPTIONS**

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6. Assessing reasonable alternatives

Introduction

6.1 To support the consideration of the suitability of these sites for allocation in the NBNP, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise as a result of development. In this context the sites have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping (see **Table 3.1**).

Methodology

6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects.

6.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make certain assumptions regarding how options will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

6.4 Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.

6.5 Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.²⁰ So, for example, account is taken of the duration, frequency and reversibility of effects.

Alternatives assessment findings

6.6 **Table 6.1** presents summary assessment findings in relation to the site options, with more detailed assessment findings presented within **Appendix III**.

²⁰ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Table 6.1: Summary alternatives assessment findings

SEA Theme	1. Land off A363 off White Horse Business Park	2. Park Farm	3. Elm Grove Farm	4. Paddock at Little Common Lane	5. 54 Woodmarsh	6. Southwick Court	7. Organ Pool Farm
Biodiversity	6	3	5	1	2	7	4
Land and soil resources	5	3	7	1	2	6	4
Water resources and flood risk	1	1	1	1	1	2	1
Climate Change	5	3	7	1	2	6	4
Historic environment	3	1	2	2	2	1	1
Landscape	3	1	3	1	1	2	1
Population and housing	3	5	1	7	6	2	4
Community wellbeing and health	2	1	3	1	1	3	1
Service centre provision (including education)	1	3	6	5	4	6	2
Transport	1	2	?	2	2	?	2
Economy and enterprise	1	4	2	3	3	5	4

Summary findings:

The assessment has highlighted the potential for significant negative effects to arise relating to the following key issues:

- HRA screening of a site nearby to Site 1 and Site 6 (17/03269/OUT) has identified that development in this location could adversely impact on the Bath and Bradford on Avon SAC, which provides a home to a number of rare and protected species of bat, including Bechstein’s bat. The screening identifies that any medium-scale growth in the area is likely to lead to disturbance. Development at sites 1, 2, 3, 6 and 7 is therefore considered to have the potential for significant negative effects on biodiversity and further ecological assessment will be required prior to development.
- The western half of Site 6 (Southwick Court) is located partially within Flood Zones 2 and 3 (predominantly 3) which surround the Lambrook Stream. Whilst development could avoid flood risk areas around the northern border of the site, the stream runs north-south through the site which may make mitigation more difficult – particularly

considering future flood risk as a result of climate change. Development also has the potential to affect the water quality of the stream, and it is recommended that Sustainable Drainage Systems are required for development to minimise impacts associated with surface water run-off. In light of these findings, the site is identified for a potential significant negative effect; though it is recognised that mitigation or a reduced allocation site size may be able reduce this to a residual minor negative effect or alleviate effects respectively.

- Site 1 (Land off A363 off White Horse Business Park) contains designated heritage assets located in the burial ground of the former Baptist Chapel. These include the Grade II Listed 'Two Monuments in Burial Ground of Former Baptist Chapel' and the Grade II Listed 'Gateway to Burial Ground of Former Baptist Chapel'. The site is also adjacent to two further Listed Buildings (Kings Farmhouse and Willow Grove). Development therefore has the potential to affect the designated heritage assets and their settings. Mitigation will be required to reduce the extent of the potential negative effects; and it is considered that development also has the potential to enhance the setting of the designated heritage asset. The potential effects of development are ultimately dependent upon design, and layout and lower level assessments. It is recommended that policy requires a heritage impact assessment and mitigation strategy prior to any development. Taking a precautionary approach it is considered appropriate to identify at this stage however the potential for significant long term negative effects on the historic environment.
- Development at Site 3 is considered to avoid encroachment through its enclosure by existing development. However, if built out the site would extend the built form of Trowbridge so as to envelop White Horse Business Park. This would create an urban extension of Trowbridge wrapping around the north and east of North Bradley. Development at Site 1 would also close the landscape gap that separates the village from White Horse Business Park, and the implications this has for the 'villagescape' are significant. Furthermore, if both Site 1 and Site 3 are developed, the cumulative effects would result in amalgamation with Trowbridge through a complete loss of landscape gaps in the east of the village; it is therefore considered that there is the potential for significant negative cumulative effects on the landscape.
- Historic England has raised concerns in relation to the level of development at Site 4, which could affect designated heritage assets close by. As such, at this stage it is recognised that there is the potential for a significant negative effect. Mitigation such as a reduced level of development and appropriate design and layout may reduce the extent of these potential effects.
- Development at Sites 1, 3 and 6 will significantly reduce the presence of open space in the north of the Plan area. This is likely to negatively affect community health and wellbeing in terms of access to the countryside and areas of open space for recreation. At Sites 3 and 6 this is also considered likely to extend the effects to the local community of Trowbridge who are also likely to rely on this space for recreation and access to natural spaces. As such, it is considered that development at these sites has the potential for significant long term negative effects without significant mitigation in the form on site provisions of natural spaces.

The assessment identifies that housing growth will support residents in the long term by meeting local housing needs, and the positive effects are of greater significance at Sites 1, 2, 3, 5, 6 and 7. The assessment has also identified significant potential to positively affect local transport and accessibility through development at Site 1 which could connect the village more directly and more sustainably with White Horse Business Park.

Overall, whilst the larger site options (Sites 1, 3 and 6) perform better in terms of delivering housing numbers and supporting the wider Community Area housing needs (particularly

those of Trowbridge) and delivering new infrastructure, this has to be considered in terms of the wider context. The housing would be provided in an area subject to significant constraints, such as protected bat species which are affected by the cumulative effects of growth. Large scale growth opposes community aspirations for smaller sites, and there are localised impacts in site allocations in retaining a separate identity from Trowbridge. Larger growth is also considered to increase the potential for, or extent of, negative effects associated with: the efficient use of land and protection of soil resources; surface water run-off; impacts on local highways networks and the associated effects on air quality; and the loss of open land for recreation. The potential for significant negative cumulative effects on the landscape and village identity are also identified should both Site 1 and Site 3 be bought forward for development.

Given the ecological sensitivity of the Plan area, it is recommended that development proposals for any of the site options are accompanied by ecological impact studies and mitigation strategies that contribute to the wider aims of bat species preservation.

It is considered that small scale growth that integrates with the settlement however can support improvements to transport infrastructure, and maximise opportunities to enhance active travel within the NBNP area. Small scale growth focused around the existing settlement area (achievable at Sites 2, 4, 5 and 7) could allow the settlement to grow sustainably, without detracting from the character and identity of the village or the wider setting of the Parish.

7. Developing the preferred approach

7.1 Following a review of the evidence and consideration of community aspirations for the area, the NBNP proposes to allocate one site, as follows:

- 54, Woodmarsh (SHELAA Site 1040, referred to as Site 5 in the SEA of reasonable alternatives) for the development of 25 homes, 8 of which will be affordable homes.

7.2 The Parish Council have identified the following reasons for dismissing the remaining site options for allocation in the NBNP:

Table 7.1: Reasons for non-progression of options

SHELAA / SHLAA Ref	SEA Ref	Site Name	Reasons for non-progression in NBNP
298	1	Land off A363 off White Horse Business Park	The site is allocated within the emerging Wiltshire Housing Site Allocations Plan (HSAP) – Site H2.2
322	2	Park Farm	The site is not supported by the local community
613	3	Elm Grove Farm	The site is allocated within the emerging HSAP – Site H2.1
672	4	Paddock at Little Common Lane	Access issues and heritage constraints that would need to be overcome. Potential for re-consideration of the site in the next Plan review if demonstrated that these issues can be overcome.
3565	6	Southwick Court	The site is allocated within the emerging HSAP – Site H2.6
N/A	7	Organ Pool Farm	<ul style="list-style-type: none"> • The site is not supported by the local community; • The site is too large considering local needs and is not a strategic site aimed at meeting the needs of Trowbridge; • The large scale of development proposed at the site is considered inappropriate in terms of the limited existing facilities and infrastructure and there are concerns over the viability of development bringing forward sufficient improvements or new provisions; and • The large scale of development is considered inappropriate in terms of the cumulative effects of development on bat species.

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

- 8.1 This part of the report presents an assessment of the current submission version of the Neighbourhood Plan. The Environmental Report accompanying the Pre-Submission consultation version of the Neighbourhood Plan (October 2018) presented an assessment of the likely significant effects of the earlier version of the plan.

Methodology

- 8.2 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.3 For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.²¹ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 8.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

²¹ Environmental Assessment of Plans and Programmes Regulations 2004

9. What are the appraisal findings at this current stage?

Introduction

- 9.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the North Bradley Neighbourhood Plan. This chapter is structured as follows:
- **Sections 9.2 to 9.41** present an appraisal of the submission version of the North Bradley Neighbourhood Plan under the ten SEA theme headings established at scoping; and
 - **Sections 9.42 to 9.48** subsequently discuss overall conclusions and recommendations at this current stage.

Biodiversity

- 9.2 Biodiversity and features of note within the Neighbourhood Plan area and which may be affected by development include Brokerswood County Wildlife Site, Picket and Clanger Wood which is an SSSI and a Local Nature Reserve, and a network of BAP priority habitats. Bechstein's Bat along with other bat species from the Bath and Bradford on Avon Special Area of Conservation (SAC) use parts of the Neighbourhood Plan area for roosting and foraging.
- 9.3 To accompany the preparation of the Neighbourhood Plan, a Habitats Regulations Assessment (HRA) screening process was undertaken which emphasised the importance of Bath and Bradford on Avon SAC and highlighted that this could be a major constraint on development. A bat consultation area covers part of the Neighbourhood Plan area.
- 9.4 The north of the NBNP area is subject to growth proposed through the Housing Site Allocations Plan (HSAP), which has the potential to affect local biodiversity through natural habitat loss and an increase in associated negative effects such as noise and light pollution and recreational disturbance. A key concern for biodiversity is therefore the cumulative impact of delivering further development within the Plan area, particularly for bat species which are sensitive to development.
- 9.5 The spatial strategy proposed through Policy 3 (Housing Site) allocates a total of 25 new dwellings at one site: 54 Woodmarsh.
- 9.6 The site does not contain any identified Priority Habitat; however it does lie in close proximity to woodland Priority Habitats; and as such the retention of key features on site that provide ecological connectivity (such as hedgerows) will be required to support sustainable development. Policy 3 emphasises that for the allocated site an ecology study would be required prior to development commencing due to the presence of the SAC, and that design should deliver for a net gain for biodiversity. This will support ecological networks and support the integrity of surrounding BAP priority habitats.
- 9.7 In the context of bat protection, Policy 3 (Housing Site) states that the allocated site is to be accompanied by an appropriate ecological evaluation of impact and a statement explaining how they will meet the requirements of the Wiltshire Bat Mitigation Strategy, support the wider biodiversity aims for Wiltshire. Further protection is provided through the Wiltshire Core Strategy where Core Policy 50 states that: "*any development*

potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network". The Neighbourhood Plan further enhances protections through Policy 5 (Bat Conservation Policy) which requires that *"all applications for development within the plan area must be accompanied by an ecological report identifying the likely impact of the proposals on protected bat species, including those from the Bath and Bradford on Avon SAC".* Additionally, it states that *"every effort must be made to avoid harm to bats and their habitat, and indeed habitat enhancement, if practicable, should be attempted where this is possible. The ecological report must include proposals for such enhancement if appropriate as well as any appropriate mitigation measures."* The policy provisions are considered sufficient to ensure that development does not lead to significant negative effects, though it will be important for Wiltshire Council to monitor the potential cumulative effects of growth across the wider Trowbridge Community Area.

- 9.8 A number of other policies put forward in the Neighbourhood Plan have either a direct or indirect positive effect upon biodiversity. Policy 1 (North Bradley Gap - Landscape Setting and Housing Sites in the Wiltshire Housing Site Allocations Plan) states that the scheme must preserve local biodiversity and habitat; thus supporting the protection of biodiversity within the Neighbourhood Plan area. Policy 4 (Local Green Space) and Policy 7 (Parish Burial Ground) both relate to the establishment of new green or open space which will support the retention and enhancement of existing habitats and natural spaces that contribute towards ecological connectivity with the potential for both direct and indirect long term positive effects.
- 9.9 To enhance the potential for positive effects, policy provisions could be extended so as to explicitly require biodiversity net gain in development. However, overall, the NBNP sets a solid basis for the protection and enhancement of habitats and ecological connectivity in the Neighbourhood Plan area, and supports the Wiltshire planning framework with localised biodiversity opportunities and protections that support ecological connectivity in the wider context.

Land and soil resources

- 9.10 The NBNP is surrounded by significant areas of greenfield/ agricultural land, and the soil resources are predominantly graded 3b agricultural land. The spatial strategy proposed through the NBNP in Policy 3 (Housing Site) allocates one greenfield site within/ adjoining the settlement area. Whilst development will not lead to the loss of highest quality 'best and most versatile' agricultural land (Grade 3a and above) the loss of soil resources is considered to have the potential for **minor long term negative effects on this SEA theme**.
- 9.11 The NBNP does not propose policy that will affect waste management, and whilst housing growth will ultimately increase local waste production, growth forecasts are accounted for within the provisions of the Wiltshire Waste Management Strategy which should ensure that no negative effects arise. As such the NBNP is likely to lead to a neutral effect on the baseline in terms of waste.

Water resources and flood risk

- 9.12 The water resources and flood risk SEA theme has the dual focus of limiting flood risk in the Neighbourhood Plan area and on using water resources sustainably. In practice this is likely to mean directing development away from areas of highest risk and engaging Sustainable Drainage Systems (SuDS) in new schemes where appropriate. The Neighbourhood Plan area's eastern boundary is formed by the River Biss and there is an associated area of flood risk running in a relatively narrow corridor either

side of the river. There are also dispersed areas of surface water flood risk throughout the Plan area. It will therefore be important for development allocations to be directed away from these areas of risk.

- 9.13 Policy 3 (Housing Site) details the site allocation identified by the Plan north of Woodmarsh. The site is outside the fluvial flood zone and is at low risk of surface water flooding, and the policies therefore make no mention of flood risk mitigation on either site. Given the low risk associated with each allocation this is considered appropriate.
- 9.14 The other policies in the plan do not seek to address flooding and flood risk. However, there does not appear to be any aspect of these policies with potential to result in increased flood risk to new or existing development.
- 9.15 Whilst the Neighbourhood Plan does not propose policy on sustainable use of water resources, the Wiltshire Core Strategy provides Core Policy 67 which should ensure sustainable use of water resources. Core Policy 67 requires sustainable drainage systems in all new development which will support the management of surface water in the NBNP area.
- 9.16 It is considered that the Neighbourhood Plan is likely to have an overall **neutral effect on the water resources and flood risk SEA theme**.

Climate change

- 9.17 The climate change SEA theme has a dual focus on reducing contributions to climate change from activities in the Neighbourhood Plan area and supporting resilience to the effects of climate change. There are synergies between the climate change theme and the transport theme as enabling and encouraging more journeys to be made by sustainable transport will contribute to meeting the objectives of both. In this context Policy 6 (Developer Contributions Policy) sets out a list of local infrastructure priorities which developers will be expected to contribute to delivering. These include a range of measures to boost the local sustainable transport offer, including “*improvement of existing footpaths*”; “*installation of cycle paths linking the parish with Trowbridge*” and “*improvement of local bus services*”. If these enhancements can be secured through developer contributions, they would represent a fairly comprehensive range of interventions targeting local pedestrian travel within the village and longer distance travel to services and facilities in Trowbridge. This could be an effective way of replacing short emission-generating journeys, such as the school run, with walking and cycling.
- 9.18 The allocation in Policy 3 (Housing Site) is on a greenfield site at the edge of the existing built up area. Whilst it is acknowledged that there will likely be an element of open space incorporated into the final schemes on the site there remains a considerable amount of currently undeveloped land which will become hard surfacing. There could be associated impacts for level of rainwater runoff and drainage. In this context it is recommended that a requirement to consider the use of Sustainable Drainage Systems (SuDS) on the allocated site is added to Policy 3.
- 9.19 It is considered that the Neighbourhood Plan will have an overall **neutral impact on the climate change SEA theme**.

Historic environment

- 9.20 Whilst the allocation proposed through the HSAP have the potential to affect the designated heritage assets and historic settings at Southwick Court, this is recognised through the HSAP which requires appropriate Heritage Impact Assessment and the preservation and enhancement of assets and historic settings to minimise harm to significance.

- 9.21 The NBNP area contains designated heritage assets, however; the spatial strategy proposed through Policy 3 (Housing Site) allocates a site that is not subject to any heritage constraints. The allocated site '54 Woodmarsh' is located in close proximity to Grade II Listed structures at the burial ground of the former Baptist Chapel; however it is considered that the Listed features are largely screened by existing treelines and development adjacent to the allocated site, and alongside project level mitigation such as good design and natural screening no negative effects are considered likely.
- 9.22 Overall it is considered likely that the NBNP will lead to **residual neutral effects on the historic environment**.

Landscape

- 9.23 North Bradley is separated from Trowbridge by fields which provide a strategic gap; supporting the retention of local identity and the character of North Bradley. A key objective for the NBNP is to retain a landscape gap between North Bradley and Trowbridge, to support the retention of this separate identity. This is compromised to some degree by the allocations proposed through the Housing Sites Allocations Plan (HSAP) which propose development on significant tracts of land in this area. A key concern in terms of the spatial strategy proposed through the NBNP therefore is the cumulative effect of further development in the Plan area.
- 9.24 In terms of the proposed spatial strategy, the site allocated through the NBNP at '54 Woodmarsh' is located within the settlement edge where development can be easily integrated and avoid the further loss of land within the area separating North Bradley and Trowbridge – with the potential for long term positive effects. Policy 3 (Housing Site) proactively increases the potential for successful integration in landscape terms, by requiring development at the site to provide landscape enhancements and retain key existing landscape features.
- 9.25 Core Policy 29 of the Wiltshire Core Strategy recognises that *'the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities'* and envisages that *'local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning'*. The NBNP responds to this proactively through the spatial strategy as outlined above, and by Policy 1 (Landscape Setting and HSAP Housing Sites) which states that the *"overall openness and landscape value of the Gap must not be compromised nor the rural setting of North Bradley harmed"*. This policy does not support development which will reduce the settlement gap and development taking place within the North Bradley Landscape Protection Area, and seeks to reduce the extent of the effects arising from the sites proposed through the HSAP by reducing the quantum of development, and providing indicative layouts.
- 9.26 Overall it is considered that the proposed spatial strategy and policy provisions enhance local landscape protections and seek to proactively manage the issues arising for development in the north of the Plan area, with the potential for **long term positive effects**.

Population and housing

- 9.27 The NBNP sets an objective *'to allow the community to grow and develop in a sustainable way, with new housing and matching infrastructure'*. The Housing Needs Survey has further identified a need for 3 affordable homes over the Plan period, and a development scheme with a minimum target of 20 homes to deliver this number as a percentage requirement for development. The spatial strategy of the NBNP seeks to

deliver around 25 new homes (including 8 affordable) on one site, which will deliver enough units on site for affordable housing delivery requirements to apply. As such the NBNP goes over and above the minimum requirements to support the future delivery of housing, which will also support the delivery of the wider housing needs of the Trowbridge Community Area. As such it is considered likely to deliver **long term significant positive effects** for the population and housing.

- 9.28 The NBNP further proposes Policy 2 (Housing) to identify support for specific types of housing such as small scale schemes and infilling, affordable self-build units, eco-homes, homes that provide flexibility for an ageing population, and entry level affordable homes. The Policy seeks to deliver housing that will meet localised needs and aspirations arising from evidence such as the Housing Needs Survey and community consultation; and as such is also considered likely to lead to **long term significant positive effects** for the population and housing SEA theme.

Community wellbeing and health

- 9.29 The NBNP seeks to support community health and wellbeing with objectives to; preserve open space, allow the community to grow with new housing and matching infrastructure, to reduce vehicle speeds and thus increase safety, to improve the cleanliness of the area, and to support enhanced community facilities – in particular the delivery of a new burial ground to meet localised needs.
- 9.30 The NBNP proposes Policy 4 (Local Green Space) to identify and protect Local Green Spaces that support local recreational needs. The policy supports the extension and enhancement of these areas and limits development in line with the NPPF. The protection and enhancement policy thus supports community health and wellbeing with the potential for long term positive effects.
- 9.31 In terms of community facilities, the NBNP supports accessibility through the spatial strategy which allocates sites within/ adjacent to the existing built up area, and seeks to enhance the provision to meet identified localised needs for a burial ground with the potential for long term positive effects. Policy 7 identifies support for the provision of a burial ground and whilst it is considered that allocation of a potential site could enhance the potential for positive effects, it is also recognised that there are external factors limiting the scope of influence (i.e. time constraints, developer input in site selection). To enhance the potential for positive effects however, it is considered that the Policy 7 could be extended to include those aspirations identified for such a site – like good accessibility and biodiversity enhancements. The policy could also contribute to meeting wider community health and wellbeing aims by identifying support for a strategy to manage aspects like litter/ cleanliness which is identified as a local issue.
- 9.32 In terms of housing, the spatial strategy proposed through the NBNP seeks to deliver new homes that support localised needs, including the identified need to deliver one affordable home – in locations that support the growth of communities in such that they are accessible and can be easily integrated, and bring about local benefits. The spatial strategy allocates through Policy 3 one site that could deliver over and above the identified needs with the potential for long term positive effects. Policy 6 seeks developer contributions that will support local priorities to improve footpaths, improve cycle paths, upgrade recreational facilities, provide new health care facilities and support the delivery of the burial ground. The policy is also considered likely to lead to long term positive effects for community health and wellbeing.
- 9.33 Overall it is considered that cumulatively the protection of local green spaces, alongside enhancement of community facilities, the delivery of new housing and the

targeting of development contributions are likely to lead to **long term significant positive effects** for community health and wellbeing.

Transport

- 9.34 The transport SEA theme seeks the promotion of sustainable transport use and a reduction in the overall need to travel. Although the NBNP area is located in close proximity to nearby employment centres, particularly the county town of Trowbridge, it also contains a range of employers and employment sites within the Parish. This means that travel patterns are likely to be more complicated than simply out-commuting as employment areas such as the White Horse Business Park provide a source of in-commuting also. Despite this, however, the SEA scoping report notes that “*most residents commute to work over some distance*” and that “*long journey times, unnecessary emissions and worsened air quality*” form part of the future baseline without improvements.
- 9.35 The Neighbourhood Plan allocates a total of 25 new dwellings over the plan period. In addition, there are further allocations within the Parish in the emerging Wiltshire Housing Site Allocations Plan (HSAP), including one site allocated for 175 dwellings. Development of this scale could have potential impacts on the local road network, particularly at key junctions or pinch points. One way to mitigate or minimise this impact will be to encourage residents to use sustainable transport where possible.
- 9.36 As discussed under the climate change topic heading, Policy 6 (Developer Contributions Policy) sets out a list of local infrastructure priorities which developers will be expected to contribute to delivering. These include a range of measures to boost the local sustainable transport offer, including “*improvement of existing footpaths*”; “*installation of cycle paths linking the parish with Trowbridge*” and “*improvement of local bus services*”. If these enhancements can be secured through developer contributions they would represent a fairly comprehensive range of interventions targeting local pedestrian travel within the village and longer distance travel to services and facilities in Trowbridge. Whilst these measures would not fully offset the additional road users associated with new development, particularly given the high rate of out-commuting in the Parish, they would likely help eliminate unnecessary short distance travel to the most local services. This could have a minor positive effect on congestion caused by short distance local journeys, such as taking children to school.
- 9.37 Despite this, the SEA scoping report notes that there is evidence to demonstrate traffic and congestion are increasing problems in the Parish, particularly at peak hours. It is considered unlikely the proposed new dwellings would represent a level of growth significant enough to deliver enhancements to the road network though it could be enough to produce a substantial number of additional road users.
- 9.38 Therefore, it is considered that whilst the Neighbourhood Plan will likely add new road users to an already well-used local road network there is limited scope for the Neighbourhood Plan to address this directly. However, the potential enhancements to the sustainable transport network facilitated in part through the Neighbourhood Plan could be significant and would improve walking and cycling options both for new and for existing residents. On balance it is therefore considered that the Neighbourhood Plan is likely to have an overall **significant positive effect on the transport SEA theme**.

Economy and enterprise

- 9.39 The NBNP does not seek to deliver new employment land, however, the White Horse Business Park is a prominent feature within the Plan area, which supports the local

economy and provides access to employment opportunities. The NBNP provides indirect support for the employment area by seeking transport and infrastructure improvements that can improve accessibility in and around this area. This includes key aims to direct development contributions towards the improvement of footpaths and cycle paths to support active travel opportunities. Overall it is considered likely that the NBNP will lead to **indirect minor positive effects** for this SEA theme.

Conclusions and recommendations

- 9.40 Overall the appraisal of the NBNP has not identified the potential for significant negative effects. The SEA themes which are most sensitive to development in the NBNP area are biodiversity and landscape.
- 9.41 In terms of biodiversity a key concern is the cumulative effect of development on bat species and the Bath and Bradford on Avon SAC; however the appraisal has identified that policy provisions are likely to ensure that development will not lead to any significant negative effects in this regard. Higher level monitoring of the effects of development on bat species will also support the ongoing management of these key biodiversity features.
- 9.42 In terms of landscape, a key concern is the open gap in the north of the Plan area which provides separation between North Bradley and Trowbridge and is integral to local distinctiveness. Considering the development proposed in the north of the Plan area through the HSAP, there is concern over the cumulative effects of development on this strategic landscape gap. The NBNP proactively tackles this issue with a spatial strategy that does not undermine the gap, and policy proposals that seek to retain the gap and support landscape character.
- 9.43 Minor negative effects are identified as a result of the small scale loss of greenfield land and soil resources at the development sites.
- 9.44 The potential for significant positive effects are identified for the SEA themes of population and housing, community wellbeing and health, and transport. This largely relates to the delivery of new development, including: new housing which supports localised needs – particularly in terms of housing type; policy provisions which provide protection for local green spaces and recreation; support for new community facilities such as a burial ground to meet local needs; and the provision of improvements to sustainable transport networks – including the enhancement of active travel opportunities.
- 9.45 Overall it is considered that the NBNP takes a proactive approach to delivering new development whilst protecting key aspects of the natural and built environment that contribute to the overall quality of place and living in this area. The NBNP seeks to proactively address the cumulative effects arising from implementation of the HSAP alongside the NBNP and seeks to reduce the potential for negative effects in this respect, whilst maximising the potential for positive effects arising.

Part 3: What are the next steps?

10. Next steps

10.1 This part of the report explains next steps that will be taken as part of plan-making and SEA

Plan finalisation

- 10.2 This Environmental Report accompanies the submission version of the North Bradley Neighbourhood Plan for subsequent Independent Examination.
- 10.3 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the adopted Wiltshire Local Planning Framework.
- 10.4 If Independent Examination is favourable, the North Bradley Neighbourhood Plan will be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the North Bradley Neighbourhood Plan will become part of the Development Plan for Wiltshire, covering the defined Neighbourhood Plan area.

Monitoring

- 10.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the NBNP to identify any unforeseen effects early and take remedial action as appropriate.
- 10.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Wiltshire Council as part of the process of preparing its Annual Monitoring Report (AMR).
- 10.7 The SEA has not identified any potential for significant negative effects that would require closer monitoring.

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Appendix I: Regulatory requirements

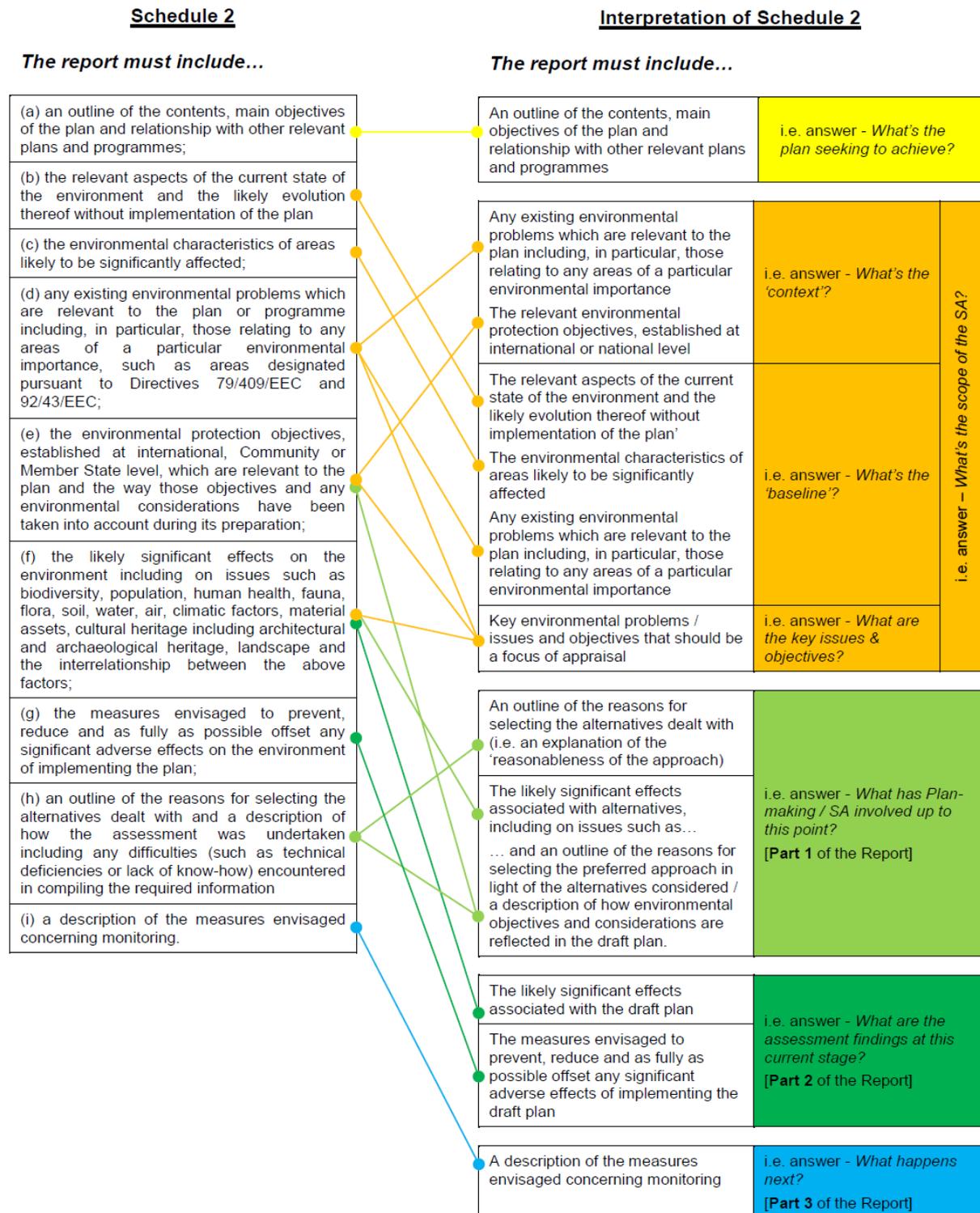
As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table AI.1: Questions answered by this Environmental Report, in line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the Environmental Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the SEA scope?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1		What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2		What are the SEA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan

	Questions answered	As per regulations... the Environmental Report must include...
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table AI.2: Questions answered by this Environmental Report, in-line with regulatory requirements



Appendix II: The SEA Scope

The aim here is to introduce the reader to the scope of the SEA, i.e. the sustainability issues/objectives that should be a focus of (and provide a methodological framework for) SEA.

The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability issues for the Neighbourhood Plan; and
- An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.

The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.²² As such, the Scoping Report was released to these authorities for consultation between the period 19th September 2018 and 24th October 2018.

The consultation responses are detailed in **Table AII-1** below:

Table AII-1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Natural England	
██████████ Lead Adviser, Planning & Licencing – Somerset, Avon and Wiltshire	
<p>Our main area of interest is Table 3.1. We note that the first decision aiding question is: support continued improvements to the status of internationally and nationally designated sites of significance in the vicinity of the Neighbourhood Plan area, including the Bath and Bradford on Avon Bat SAC, the Picket and Clanger Wood SSSI and the Steeple Ashton SSSI?</p> <p>As we see it one of the main tasks of the SEA is to differentiate between policy options with respect to how they might impact on Bechstein’s and other bat species associated with the SAC. In our view the above question doesn’t articulate this issue as well as it might. Steeple Ashton SSSI is geological, so very unlikely to be impacted at distance by the Neighbourhood Plan. The features of Picket and Clanger Wood SSSI (other than bats) are unlikely to be affected differently by options in the Plan. A clearer question might be:</p> <p>‘maintain and improve the landscape for bats associated with the Bath and Bradford on Avon Bat SAC and/ or Picket and Clanger Wood SSSI?’</p>	<p>Comment noted.</p> <p>The suggested assessment question has been added to the SEA Framework</p>

²² In line with Article 6(3) of the SEA Directive, these consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes”.

Consultation response	How the response was considered and addressed
Environment Agency ██████████ Planning Advisor Wessex Sustainable Places	
<p>Thank you for your below email. We offer the following comments.</p> <ul style="list-style-type: none"> · Page 15 (table showing relevant plans for flood risk) – Environment Agency Flood Risk Maps – this could be split into ‘EA Flood Zones’ and ‘Flood Map for Surface Water’, to be more specific and more accurate. · Page 46 – we support the exploration of the questions raised / objectives in the first two rows of the table. 	<p>Comment Noted. Maps will be split according to recommendation in any iteration.</p>
Historic England	
<p>No comments received on the Scoping Report.</p>	<p>N/A</p>

Whilst Chapter 3 presents a summary of the SEA scope, in the form of the SEA framework, this appendix presents more detailed information. Specifically, this appendix presents a discussion of key issues and objectives under each of the SEA topic headings, also giving consideration to how the SEA scope was modified following consultation.

Biodiversity

The vast majority of land in the Parish is open countryside amounting to approximately 716 hectares (1768 acres). All the land apart from the public spaces e.g. playing fields and allotments is farmed. Approximately half is arable and the rest mainly pasture. The allotments contribute significantly as a habitat for birds and invertebrates.

Brokers Wood is a County Wildlife Site and County Park, and Picket Wood is a Local Nature Reserve and SSSI. Additionally, there are several of what the Wiltshire BAP identifies as ‘Priority Habitats’ present. These include:

Rivers, Streams and Standing Water

The Biss is more of a stream than a river during its crossing of North Bradley Parish. In the nineteenth century, it was, however, deep enough to be used for baptisms. Nevertheless, it has considerable importance for wildlife, being designated a County Wildlife Site in its own right. Along the banks is mature vegetation, including willows and hedges. The stream itself is home to native fish species such as minnow and stickleback as well as fresh water shrimps and numerous insects. In addition to the balancing ponds near the White Horse Business Park, there are several small ponds within the parish (such as Swan Pond at Phillips way) some of which are in neglected state. The most significant area of open standing water is the 5-acre lake at Brokers Wood, which is fished for Carp, Bream, Chub, Tench and Roach well as being home to a large number of invertebrates, birds and amphibians. However, the balancing ponds at Philips Way / A363 Yarnbrook are also a significant habitat resource and could benefit from conservation action. A viewing platform to enable use by schools for educational purposes has also been proposed.

Ancient and Species Rich Hedgerows

Hedgerows act as wildlife corridors - highways enabling many species to move to gather food and find mates. However, they are also habitat themselves for hundreds of plant and insect species, birds and mammals. Nationally hedgerows are under threat – with 23% of

English hedges being lost between 1984 and 1990. The Wiltshire and Swindon Landscape Conservation Framework states that: 'The remaining hedgerows network will not recover naturally, but will require management intervention at a landscape scale'.

There are miles of mature hedgerows all around the Parish and mainly consist of elder, blackthorn, field sycamore, hawthorn, holly and field oak. There are blackberries, dog rose and honeysuckle. These are vital places for food, habitats and nesting for birds, mammals, insects, invertebrates and butterflies (the latter being in serious decline of 70% from 1976-2014 due to the destruction of these habitats). In North Bradley, many of the hedgerows are in a degraded state and need re-planting – in particular with native trees.

The whole parish has hundreds of mature trees apart from those in the two main woods. These are found in the hedgerows, alone or in clumps in fields and, to a lesser degree in private gardens and public spaces. These trees help to improve air quality, absorb sound and provide wildlife habitat - quite apart from their contribution to defining the ruralness of the landscape.

Woodland

The ancient woodlands of both Pickett Wood and Brokers Wood are really the jewels in the biodiversity crown of North Bradley. Brokers Wood, an award-winning country park much used for recreation from walking to fishing and camping, teems with hundreds of species, many endangered, from fungi to reptiles, mammals, birds and plants.

Picket Wood comprises both broadleaved and coniferous elements. The broadleaved includes: hazel, ash, hornbeam, field-maple, midland hawthorn, willow and privet, pedunculated oak, ash or hornbeam standards, aspen and downy birch. Characteristic woodland flowers, such as primrose and dog violet are plentiful. As are meadowsweet, common valerian, and marsh thistle. Over forty plant species indicative of ancient woodland are present, including Forster's wood-rush, broad-leaved helleborine and early purple orchid.

Picket Wood is an SSSI, famous for the huge range of butterflies and moths' resident there. These comprise more than 35 species of butterflies and 300 species of moth. Butterflies include the rare and vulnerable high brown, pearl-bordered, silver-washed, dark green and small pearl-bordered fritillaries. Birds are plentiful including the nightingale, kestrel and sparrow-hawk, tawny owl, cuckoo, turtle dove, garden warbler and blackcap, willow-tit, nuthatch, green woodpecker and great-spotted woodpecker. The fauna of the wood includes common lizard, stoat and weasel, together with woodmice, bank vole and shrew.

Farmland habitat

Arable Farmland is the most plentiful habitat in Wiltshire, at around 50% of the county's area. Farming has been practiced here for over 3000 years and has resulted in fairly large fields and few trees. Much of the land in the Parish is farmed. This land is home to a range of species from plants, insects, fungi, birds and small mammals. Intensive farming during the 1980's and 90's led to sharp declines in many species, especially birds. There is some evidence that this may be reversing due to changes in agricultural policy and practice. However, it seems safe to say that the biodiversity of farmland is less rich than it was two or three generations ago.

Built Environment

Built up areas, with their trees, gardens, buildings and drainage systems are habitats too.

In North Bradley, local beneficiaries include Hedgehogs (an endangered species), Sparrows (also endangered), mice, owls, swallows, starlings, house martins and swifts. Churchyards, road verges, allotments and private gardens – especially those with ponds or water features - are an important part of this habitat. There is the potential to improve the value of this habitat considerably.

Protected Bat Species

North Bradley is not far from the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). This is a Natura 2000 site and an HRA is normally required for development that might affect it. It is home to the rare Bechstein's bat, the greater horseshoe bat and the lesser horseshoe bat. Wiltshire Council has produced draft planning guidance on protecting these bats. This states:

'The ... protected sites form the main hubs or nodes. Beyond these lie an integrated network of commuting routes, foraging areas and roosts which are used throughout the year. Even activities which occur some distance from the designated sites may damage important elements of the network and disrupt population dynamics'.

The guidance goes on to describe, how the bats may travel far beyond the main sites; to temporary roosts; to foraging areas; and along 'commuting corridors'. The guidance establishes a consultation zone, within which all developments should carry out surveys for bats as part of development proposals. See map as Appendix 3a. While North Bradley is just outside this zone, it is not drawn with precise local knowledge and the parish does contain habitat features which would be of interest to the bats including: woodland, hedgerows, intensively grazed pastures and watercourses and wetland features. It is entirely possible that the bats are present but have not yet been recorded.

Indeed, a recent HRA produced by the LPA's ecologist for a development off Blind Lane (17/03269/OUT) in nearby Southwick concluded:

'The full extent to which Bechstein's and horseshoes use the landscape around Trowbridge is not currently known'

If bats are present then development could have a range of impacts from physical loss of roosts and foraging areas, to disruption of commuting corridors. Physical damage and loss of features such as trees, hedgerows and derelict structures, lighting, noise and recreation could all have adverse effects, as can predation by domestic cats. The HRA quoted above concluded:

'The Council cannot be certain in the light of the sites conservation objectives that the development would not give risk to adverse effects both alone and in-combination with other plans and projects, on the integrity of the Bath and Bradford on Avon Bats SAC. The application should therefore be refused'.

As this issue is currently impacted a number of developments around Trowbridge, Wiltshire Council is in the process of evolving a planning strategy to mitigate development and direct it in ways that would minimise harm. This is being partly taken forward through the HSAP and also the Trowbridge Recreation Management and Mitigation Strategy, but is not complete.

It is clear from the above HRA that there are risks this to bats and the SAC from large schemes, and so the NDP should;

- Bear the issue of bats in mind when considering the overall quantum of development that could be accommodated (the larger the scale, the more likely adverse impacts could be expected).
- Include a bat conservation policy requiring all developments to produce an ecological survey assessing the site impact on bats and the SAC.

The LPA would also be in a position to require an HRA from such schemes and would be able to enforce compliance through the planning applications system.

The NDP could also commission a survey of its own which would add to the evidence base and help determine more precisely the presence of the bats and likely impacts of specific schemes.

Threats:

- New housing and employment development will increase pressure on all habitats – although good design can alleviate this to a degree.
- Bats and the nearby SAC are particularly at risk
- Neglect of lack of management and investment will harm hedgerows and grass banks
- Farming can lead to nitrate and other run-off into water courses
- Increasing traffic will increase the level of roadkill unless crossing points are provided.

Opportunities:

- Policies already exist in the WCS protecting biodiversity and encouraging the creation of green infrastructure*. However, if a design policy is included in the NDP this could emphasise the local importance of planting new hedgerows and trees and maintaining and linking this to older networks.
- Other non-planning projects could aim to conserve the urban habitat – for example by improving and making nature-friendly back gardens, installing ponds and installing bird boxes and hedgehog houses or protecting and expanding the allotments.

SEA Objective	Assessment questions. Will the option/proposal help to...
Biodiversity	
Protect and enhance all biodiversity and geological features.	<ul style="list-style-type: none"> • Support continued improvements to the status of the internationally and nationally designated sites of significance in the vicinity of the Neighbourhood Plan area, including the Bath and Bradford on Avon Bat SAC, the Picket and Clanger Wood SSSI and the Steeple Ashton SSSI? • Maintain and improve the landscape for bats associated with the Bath and Bradford on Avon Bat SAC and/ or Picket and Clanger Wood SSSI? • Support the status of the locally designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?

Responding to consultation responses from Natural England, an additional SEA assessment question was included in the SEA framework as follows;

Maintain and improve the landscape for bats associated with the Bath and Bradford on Avon Bat SAC and/ or Picket and Clanger Wood SSSI?

Land and soil resources

The wise use of land and soil is an essential component of sustainability, not least because both are a finite resource. It is an aim of the Wiltshire Core Strategy to concentrate development onto brownfield land where possible. Core Policy 2, referring to the strategic housing target of 42,000 homes:

‘This will be delivered in a sustainable pattern in a way that prioritises the release of employment land and the re-use of previously developed land to deliver regeneration opportunities, and to limit the need for development on Greenfield sites, with approximately 35% of development taking place on previously developed land’.

North Bradley does not have an abundance of suitable brownfield land.

The NPPF requires the planning system to:

- Protect and enhance soils. The quality of agricultural land should also be taken into account
- Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or instability
- Encourage the effective use of land through the reuse of land which has been previously developed, ‘provided that this is not of high environmental value’
- While there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to ‘set out their own approach to housing density to reflect local needs’.

Other relevant information includes: ‘Safeguarding our Soils: A strategy for England’, which sets out a vision for soil use in England. The Spatial and Market Intelligence section of the Homes and Communities Agency keeps the National Land Use Statistics (the NLUD database). A pilot scheme has been set up to compile registers, but Wiltshire is not a member. The best data is therefore the 2012 SHLAA.

In 2015 the Government confirmed its wish that 90% of suitable brownfield sites have planning permission for housing by 2020 and to inform that target legislation was brought forward to require local authorities to hold a Register of available brownfield land. The new brownfield registers will soon become a statutory requirement aiming to improve the availability and transparency of brownfield information, providing certainty and encouraging investment, plus help to measure progress in delivering planning permissions on the sites listed. There is no register of brownfield sites covering North Bradley but - Appendix 3 of the 2012 SHLAA discusses the available sites in North Bradley – none of which are brownfield. There are no derelict factories, large areas of waste ground or redundant offices and the general availability of brownfield land, although not quantified due to lack of precise data, is considered to be low.

SEA Objective	Assessment questions. Will the option/proposal help to...
Land and soil resources	
Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Promote the use of previously developed land? • Direct development on greenfield sites to land not classified as the best and most versatile agricultural land?

SEA Objective	Assessment questions. Will the option/proposal help to...
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<ul style="list-style-type: none"> • Support the minimisation, reuse and recycling of waste? • Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? • Encourage recycling of materials and minimise consumption of resources during construction?

Water resources and flood risk

The most important body of water in the Parish is the River Biss, which runs pretty much along the eastern boundary of the Parish for all of its length. It crosses under the A363 between the railway bridge and the Yarnbrook roundabout. Given the relatively low-lying nature of the ground and the fact that the subsoil is clay, it comes as no surprise that a band of flood risk zone 3a (high risk or 1 in 100 year) and 3b (functional floodplain) follows the course of the river to an approximate width of up to fifty metres either side. The flood zone crosses the A363 near to the railway bridge. Balancing ponds near Philips Way and in the landscaping of the White Horse Business Park are an attempt to manage the risk.

There is a large pond in Brokerswood and a few dew ponds on farmland. It is likely that there used to be many more ponds in the past as the village only received mains water in the mid nineteenth century. Additionally, ponds would have been essential to feed livestock. Drinking water comes mainly from aquifers located in Wiltshire and Dorset. Wessex Water also has several reservoirs. A Water Network is currently being constructed which will link all of these supplies enabling water to be transported wherever it is needed by future development. As a result, there will be adequate water supply for present and projected development for the foreseeable future.

Despite the topography and the clay soils, the risk of flooding to the built-up areas of North Bradley village is very low (Flood Zone 1 – 1 in 1000-year risk). Climate change however could change the risk, with an increased likelihood of flash flooding due to run-off after heavy rain

SEA Objective	Assessment questions. Will the option/proposal help to...
Water resources and flood risk	
Limit flood risk in the Neighbourhood Plan area	<ul style="list-style-type: none"> • Ensure that no inappropriate development takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?
Use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Minimise water consumption?

Air quality and environmental pollution

There are no significant air, ground or water pollution issues in North Bradley at present. However, there are some risks, including traffic fumes from increasing traffic levels. Water supply and quality for drinking purposes is very good. **Due to the absence of significant air and water quality issues within the Neighbourhood Plan area, this theme has been scoped out for the purposes of the SEA process.**

Climate change

The evidence for climate change is now overwhelming and there is little doubt that rises in global temperature are partly the result of increased human-generated emissions. Predicted global temperature rises range from 1.1 to 6.4 degrees. Even a rise at the lower end of this scale will increase the risk of flood and storm damage in the UK as weather patterns become more unpredictable and extreme weather vents become more intense and frequent. North Bradley will not escape the localised consequences of these wider changes.

Greenhouse gas emissions

In relation to greenhouse gas emissions, data from the Department of Energy and Climate Change suggests that Wiltshire has had consistently lower per capita emissions than England since 2005, but marginally higher per capita emissions than the South West since 2009. Wiltshire has also seen smaller reductions in emissions per capita between 2005 and 2012 (15%) compared to the South West (18.2%) and England (a 17.7% reduction).²³

In its 2007 strategy on climate change, the European Commission recommended a package of measures to limit global warming to 2 degree Celsius. In relation to energy, the Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.

In 2009 the UK Climate Projections (UKCP09) issued projections of future changes to the climate, based on climate models. Projections are available at regional level across the UK and illustrate the potential range of changes and the level of confidence in each prediction. The effects of climate change for the south west by 2050 for a medium emission scenario are as follows:

- increase in winter mean temperature is 2.1°C and increase in summer mean temperature of 2.7°C
- increase in winter rainfall of 17% and decrease in summer of 20%.

It can be seen from these issues that tackling climate change is an important issue and something that policies at all levels can help with. Given a willingness to plan, local per capita emissions are likely to continue to decrease as the effects of this plus energy efficiency, renewable energy production and new technologies become more widely used. However, a likely increase in the development of Trowbridge could reverse this. Resulting from the above, a range of problems and opportunities may exist for North Bradley.

SEA Objective	Assessment questions. Will the option/proposal help to...
Climate Change	
Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area	<ul style="list-style-type: none"> • Reduce the need to travel via privately owned vehicle? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?

²³ Department of Energy and Climate Change (2011) Official statistics: Local Authority carbon dioxide emissions, UK local and regional CO2 emissions.

SEA Objective	Assessment questions. Will the option/proposal help to...
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change	<ul style="list-style-type: none"> • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks?

Historic environment

Although now dominated by 20th century development, the history of North Bradley is ancient, being mentioned in the Domesday Book, when the village was part of the manor of Steeple Ashton. Earlier remains, dating from the Roman period have also been found. A wide swathe of land roughly equating to the middle third of the Parish has been designated as an Area of Archaeological Potential.

The parish is home to a number of historic buildings – not all of them listed.

Today, most of the visible heritage of the village is grouped in a rough horse-shoe shape around the Church of St Nicholas and a small village green, the former of which dates from the 15th Century and is grade II* Listed. It seems odd that this is not officially designated a conservation area (there is no CA anywhere in the parish) Mediaeval growth was probably linked to the profitable local wool industry, which had a base for processing and weaving in Trowbridge. The wool industry declined although looms continued to operate until the 1880's in Trowbridge, with villagers walking to and from each day to work), but the village of North Bradley remained relatively large, probably due to the alternative employments available in Trowbridge in the following centuries which included brewing and light manufacturing.

There are 20 Listed Buildings in North Bradley. A large 19th-century vicarage lies to the south-west of the church. There is a sprinkling of mainly nineteenth century cottages and a few grander eighteenth century houses in the village. One somewhat older property is King's Farm, a large house, almost certainly timber-framed and dating from the 16th or 17th century.

However, while there is significant heritage in the village, both along the main road (for example at Yarnbrook) and in particular in the quieter lanes off the main roads, the majority of development is more modern. Terraces and semi-detached brick villas of the nineteenth and early 20thth centuries lie along the A 363 road, while to the south an south east of this is located the majority of the post war estate style housing that makes up the bulk of the village's building stock. Much of this dates from the 1970's and consists of detached and semi-detached houses and bungalows. The strikingly modern-looking White Horse Business Park is located to the north of the Parish, either side of the diverted A363.

Architecture

The predominant architecture in the main village is post-war – chiefly from the 1970's, 80's and 90's. This includes a range of 1-4 bedroom houses and bungalows, mainly made out of brick and concrete tile. However, it would be a mistake to write North Bradley off as just another late 20th century outgrowth of a market town. Indeed, it has an ancient history and a significant number of older buildings survive to give reminder of this. These feature traditional local methods of construction and materials and are a valuable design guide for future modern development that wants to 'belong' and also to acknowledge the past.

Older buildings celebrate the use of local materials; some Bath stone on higher status buildings and some more rustic and rough Cornbrash – a local limestone – on more ordinary structures, such as the numerous small cottages that were built in the 18th and 19th centuries. Redbrick is common on the older buildings, sometimes of an ornamental nature. Victorian and Edwardian buildings in particular may exhibit patterned brick and dentilled string courses at first floor level and sometimes at the eaves. Brick is occasionally enlivened with stone mullion windows. Roofing on the older buildings is generally clay tile, though thatch, stone and slate also exist. There are a few grand buildings (such as the Rectory) but also evidence of a humbler, more industrial past, such as brick-built malt houses. One valued local landmark is the old Tin Church of All Saints in Brokerswood, which used to stand in Southwick but was moved to Brokerswood when the St Thomas was built in Southwick 1904.

SEA Objective	Assessment questions. Will the option/proposal help to...
Historic environment	
Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.	<ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment? • Conserve and enhance archaeological remains? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?

Landscape

Land and townscape in North Bradley are very mixed. In the suburban centre, the feeling is of a typical housing estate of the 1970's and '80's, yet along some of the quieter side-roads there is the feeling of country lanes, where older cottages face open fields and hedgerows. The area around the church seems very typical of an English village, while the business park in the North of the Parish, even though landscaped, is full of very much larger buildings and has a harder, more modern and angular feel to it. These buildings and the busy main roads (B 363 and Westbury Road) help to define the harder, commercial edge of Trowbridge against the suburban and country characteristics of North Bradley.

The vast majority of undeveloped land in the Parish is open countryside, amounting to over 1600 acres. All the land, apart from public areas such as playing fields, is farmed; approximately half is arable and half pasture. Underlying geology plays a large part in establishing landscape character – being composed here mainly of clays. The landscape (a mixture of character areas B2 and E3 in the WWLCA) is fairly flat and low-lying.

To the south and south west of the main village lies open countryside – this is the remains of the large tracts of common land that existed here in earlier centuries. The land is fairly flat but with gentle undulations. It contains small wooded areas, and is mainly given over to both arable and dairy farming, the fields being enclosed by hedges and small trees. To the extreme south west lies Brokers Wood, a Country Park full of mature trees and carefully designed walks. The River Biss runs along much of the eastern edge. There is a great contrast between the more developed northern end of the parish and the south.

Although the jaws of modern development are reaching out towards it from busy, urban Trowbridge, North Bradley is still of very separate character. While urbanisation has begun, it is not far advanced. The pace of life is slower, the scale of buildings smaller and there is still strong evidence of an older and more rural past. The landscape setting, which not only surrounds much of the village but penetrates it with green enclaves of grass and trees, is distinctly rural. Even the developed areas have swathes of green in them, such as the very large green area within Malthouse Estate. There is markedly less commercial activity in North Bradley than in Trowbridge and traffic levels are lower. The softer built shapes of North Bradley and its rural surroundings are in stark contrast to the busy concrete, glass, steel and tarmac of Trowbridge.

If sound can be said to be an aspect of landscape character then this also is a factor in determining the different characteristics of Trowbridge and North Bradley. While the northern and north-eastern parts suffer from significant noise pollution (a combination of the railway, a busy road junction at Yarnbrook and the buzz of overhead power cables) North Bradley itself is something of a quiet haven, very much quieter than Trowbridge where today the traffic hardly ever seems to stop, the village streets still being quiet enough in some places for children to play in the road as several generations have done before them. The surrounding countryside is quieter still save for the occasional farm machinery and the whoosh of cars travelling to Southwick.

North Bradley is now separated from Trowbridge by just a few narrow fields. However, there is still enough greenness in this gap to keep alive the differentness and separate character of North Bradley.

Retaining the physical separation of Trowbridge and North Bradley and enhancing the greenness of the gap is inseparable from retaining the character and identity of the latter. This is emphasised by paragraph 5.150 (Core Policy 29) of the Wiltshire Core Strategy:

'it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.'

The Wiltshire Landscape Character Assessment (part of the evidence base for the WCS) goes further and suggests that the landscape in this area should be positively enhanced:

'The overall strategy for the area is to enhance the landscape setting of Trowbridge, minimizing the visual impact of the White Horse Business Park, and restore gappy field boundaries and landscape structure surrounding visually intrusive corridors and developments. Specific management objectives are:

- *Enhance the landscape setting of Trowbridge (using native species which are appropriate to local landscape character)*
- *Screen visually intrusive commercial and industrial warehouse units. Mitigate the visual impact of the A350 and A363 road corridors*
- *Conserve mature vegetation lining the riverbank*
- *Conserve the scattered and relatively isolated settlement pattern along the river corridor. (Section B2, WWLCA).*

Section E3 adds:

'Specific management objectives are to:

- *Protect the ancient woodland in the area by promoting appropriate management – consider restoring traditional practices, such as coppicing, where possible.*

- *Conserve the field pattern with the network of hedgerows by promoting ecological farming and by*
- *encouraging planting to fill in gaps in the hedges’.*

The NPPF says:

‘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; (Paragraph 170)

In order to assess the local circumstances more accurately, a landscape setting report was commissioned from a firm of qualified Landscape Architects. This report is reproduced in the NDP itself as Appendix 8 and sections of it can be found in section 6 below (the full report is given as an appendix to the NDP). The report concluded that the chief value of the landscape between North Bradley and Trowbridge was in preserving the rural setting and distinctiveness of North Bradley as a village, by preventing the coalescence of it with Trowbridge. NB: The diagram indicating the proposed landscape protection area was revised in April 2018 following sites community engagement. The revised diagram is given in the SSR and NDP.

SEA Objective	Assessment questions. Will the option/proposal help to...
Landscape	
Protect and enhance the character and quality of landscapes and villagescapes.	<ul style="list-style-type: none"> • Protect and enhance the unique combination of elements and features that make local landscapes distinctive?

Population and housing

The population of Trowbridge Community Area (TCA) has been growing steadily in line with national trends. In 2001, it was around 36,500. In the 2011 census, it had grown to 41,600. It is expected to rise to 48,500 by 2026. An important contribution to the increase is that the age distribution is changing. We are living longer and this is contributing to the population increase. Nationally, life expectancy is estimated at 79 years and rising. Here it is 83 years for women and 79 years for men. The population over 70 years of age is expected to grow by one third from 2016 to 2026.

Against this background of an increase in population, across the board nationally and in the TCA, the population of North Bradley parish has remained relatively static. During the period 2001 to 2011 the parish population has been assessed as static, around 1800 persons, although growing older.

The Housing stock in the parish in 2011 (Census) was assessed at around 750 properties. Provision specifically provided for the elderly is 8 flats in the Daubeny on Southwick Road and 5 bungalows in Church Lane, in total 13 properties. In addition, North Bradley and Yarnbrook villages have around 100 single storey bungalows which might satisfy the needs of the fit elderly, but potential elderly purchasers would have to compete with the general public for ownership. The housing stock in 2011 was:

Detached	Semi-detached	Terrace	Flat etc.
401	204	106	20

Whilst the overall population of the parish may, or may not remain relatively static, the age profile changes (2011 Census):

Age Range Years	0-4	5-9	10-17	18-24	25-64	65-74	74+	Total
Number	108	84	156	108	888	257	153	1754

Thus, the 65 and over age range comprises around 30% of the population of North Bradley Parish.

Although West Wiltshire is not the most expensive area for housing in Wiltshire, house prices do not make it easy for someone to join the housing ladder in the parish. The lowest cost house in North Bradley is currently (2017) around £100,000 for a single bedroom flat in Mead Court. For a two-bedroom house, the price is around £150,000.

The NPPF says (inter alia):

- To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. (Paragraph 59)
- Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (Paragraph 62)
- Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer) (Paragraph 63)
- Strategic policy-making authorities should establish a housing requirement figure for their whole area (65)*,
- Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area. (Paragraph 69)
- Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. (Paragraph 70)

*This was not available during NDP plan production and so housing assessment rests on the Wiltshire Core Strategy, other Wiltshire data and the Housing needs Survey.

The Wiltshire Core Strategy (2015) included calculation of the growing population in its site allocations, which totalled 7000 homes for the Trowbridge Community Area. Thanks to strategic sites such as Ashton Park (2600 homes – with 30% affordable) on publication there were only 165 remaining to be provided to meet the growing demand up until 2026. However, an update on the 2016 Wiltshire Housing Land Supply Statement (November 2016), published in March 2017, indicates that the original level of housing has now been delivered for the Trowbridge Community Area, with a zero-requirement remaining.

The North and West Housing Market Area (HMA) in which the village is located can currently demonstrate a land supply of 5.73 years, which is above the minimum 5.25 required by Government. However, the 2017 figures are based mainly on 2016 data, and do not include a significant number of known sites that are anticipated to come forward by the next data

collection point of April 2017 (see Wiltshire Housing Land Supply Statement Update March 2017).

However, the draft Housing Site Allocations Plan (HSAP) makes clear that delivery of homes in the Trowbridge area has not been as good as expected in the WCS. In order to maintain an adequate land supply for homes to meet Government Policy and for other reasons covered in the earlier policy section of this report, it is necessary to allocate more homes. The HSAP proposes three sites, of which the NDP supports one and opposes two. The preferred site, at Elm Grove Farm, is likely to deliver 200 new homes. A fuller discussion of housing, together with detailed background information as appendices can be found in the NDP itself.

A Rural Housing Needs Survey was undertaken by Wiltshire Council at the request of the NDP Steering Group. The HNS is available as a separate document accompanying the NDP and is also given as an Appendix in the Consultation Statement (CS). The report, dated February 2018 concludes that there is a relatively low level of affordable need, but earlier sections did show that there was some demand for cheaper market housing, especially in smaller sizes of 1-3 bedrooms.

Recommendations

This survey's recommendations concentrate on households unable to afford accommodation on the open market.

The following indicates the minimum need over the next three years for new affordable housing development in the parish, based on the responses to the survey. The recommendations describe a snapshot of the need for affordable housing at the time the survey was conducted and do not take account of future changes in need, for example arising from the changing housing needs of employees of local businesses. The recommendations may not represent the parish's full housing need as responses were not received from every household, for example households which are on the Housing Register but have not completed a questionnaire are not included in these recommendations (see Section 7).

- Subsidised rented housing - None
- Shared ownership / discount market homes - 1 x 1 bed
- Sheltered housing for older people - None

Respondents were then asked how many new homes they would support being built in the parish. The majority of respondents (68.8%) were in support of some new housing in North Bradley, with the most popular option (20.0% of respondents) being for between eleven and twenty new homes. 31.2% of respondents were opposed to any new housing in North Bradley parish

SEA Objective	Assessment questions. Will the option/proposal help to...
Population and housing	
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people’s needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?

Community wellbeing and health

North Bradley is a safe area to live with a wide range of services available nearby and fairly good internet and mobile connectivity. Social and community facilities are better than in much of Wiltshire. However, there are some concerns. For example, some health indicators in the Trowbridge area are worse than the Wiltshire Average and the population is ageing. There is some evidence that levels of physical exercise are also lower than is ideal and Trowbridge Community Area has a relatively high level of cardiac disease.

There are unlikely to be many people in the parish living in poverty, nor many with extreme wealth. Indeed, one of the area’s most striking characteristics is that it is ‘middle of the road’ in terms of wealth. The largest proportion of homes for example is in Council Tax band ‘C’. However, there are likely to be a significant number of ‘JAMS’ – people ‘Just about Managing’.

Although Trowbridge is something of a local ‘hotspot’ in terms of Wiltshire’s crime statistics, the level of crime in North Bradley is much lower than the national average. ‘Crime’ however is not the same as the ‘fear of crime’. With an ageing population, more visible policing and the designing out of crime in any new development may be desirable.

SEA Objective	Assessment questions. Will the option/proposal help to...
Community wellbeing and health	
Improve the health and wellbeing residents within the Neighbourhood Plan area.	<ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Align to the key priority areas outlined in the Joint Strategic Needs Assessment? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Promote the use of healthier modes of travel? • Improve access to the countryside for recreational use?

Service centre provision (including education)

There are few services or facilities within North Bradley, with the exception of 2 village halls and numerous clubs and societies. For many services, the village looks to Trowbridge. Within that context however, access to services and facilities overall is good.

There is however a recorded shortage of Open Spaces in proportion to the population served in the Trowbridge Rural Area as shown in the Wiltshire Open Space Study (2015). There are a number of special green spaces: Peace Memorial Hall, The Pound, Oak Drive Recreation Ground, Daubeny – the Common, the allotments and the Trowbridge Football Ground (within the Parish are the main ones. However, there are others of less significance such as the Green at Ash Drive and the Green adjacent to the Church of St Nicholas. The community is likely to want to preserve these and site selection for Local Green Space designation will be covered in the Neighbourhood Plan document itself.

Peace Memorial Trust Playing Field

The Trust purchased the land just after WW2 with public subscription from Winchester College for £400 It was sold on the understanding that cricket was played on the land in perpetuity which has sadly ceased some years ago. The wicket was professionally laid and was one of the best in the county. Happily, the trust is reviving it this year. Now registered as a charity, the playing field is owned by the trustees and self-supported by fund raising, grants and donations. It is a very important part of the village community as a children's play area, football pitch and annual fetes.

The Pound

This has been in North Bradley since time immemorial. Stray cattle were put in 'The Pound' until they were reclaimed. Let by the Parish Council it received rent from a deaf and blind cobbler in the 1900's. A commemorative stone was laid by Lord Hussey of North Bradley in 'The Pound' to celebrate the millennium. This could be listed by community request.

Oak Drive Recreation Ground

The developers of the estate went bankrupt before it was completed. New developers took on Pine Walk and Ash Drive but area beside Oak Drive was an eye sore. The developers donated it to the parish council in the early 1980's. Maintained by Wiltshire Council, there are memorial seats and a tree and a very popular play area for children. The northern end has trees which are a natural adventure playground for children. The area is a registered Village Green.

Daubeny – The Common

Situated in front of The Daubeny Almshouses, this was created in 1808 by Archdeacon Daubeny of Winchester College. It used to be common land that farmers used for cattle. The annual North Bradley Fair took place here in more recent times. Maintained by the Parish Council, there is a centenary seat on The Common showing names of the Parish Councillors one hundred years ago and the names one hundred years later. Less use nowadays. The Almshouses behind it are listed (Grade II) which protects the site by virtue of setting.

North Bradley Allotments

Sited in Church Lane, North Bradley (opposite St. Nicholas Close) an 893sq.m. site that comprises five allotment plots. There is also a waiting list for plots.

The site is on 25-year lease with Wiltshire Council (8 years into lease). This is the only allotment site remaining in North Bradley parish. The Parish Council have recently applied to Wiltshire Council for the allotments to be transferred to them under the 'Asset Transfer Scheme'.

Green field / football ground at Woodmarsh, North Bradley.

This area has been used for the purpose of sport and recreation for many years. It also creates a buffer zone between the parish of North Bradley and Trowbridge. It is the home of Trowbridge Town Football club and is used regularly by the club who host matches and

competitions for all age groups. The land was recently purchased by Trowbridge Town Council who have leased it to Trowbridge Town Football Club.

Proposed Local Green Space

However, the Wiltshire Open Space Study of 2015, produced by Wiltshire Council, identifies a shortfall in provision of most kinds of open space in both the Trowbridge rural and urban areas (See Appendix 8) relative to population and projected population growth. The Study sets out a clear role for neighbourhood Plans in:

- Protecting the existing resource
- Enhancing the existing resource
- Relocating the resource
- Identifying new resources
- Identifying sites no longer required.

There are 3 churches in the Parish. The Anglican Church of St Nicholas, All Saints Church at Brokerswood is a "tin tabernacle" built with corrugated iron. This is a small green iron and timber church in the hamlet of Brokerswood on the borders of the Parishes of North Bradley and Dilton Marsh. There is no electricity but old gas lamps. The church is supported by 'Friends of the Tin Church'. There is also a Baptist Church. The Baptist Parish Church has a burial ground that is now full. A fresh site is therefore needed.

Pre-School

Current provision includes 'The Willows' pre-school. This is located within the grounds of the Primary School, and started in 2004, being run by a voluntary committee made up mainly of parents. The Pre-School is a member of the Preschool Learning Alliance and is registered with Ofsted. As well as joining in with selected activities at the Primary School, the children at Willows have their own clubs and events, as well as a sensory garden.

In general Trowbridge has a diverse range of preschool childcare. There are many nurseries, preschools and childminders offering free entitlement of up to 15 hours per week for 2, 3 and 4 year olds. However, the demand is strong. The birth rate in Wiltshire averaged 5400 births per year between 2005 and 2014. But of greater concern is the proposed growth of the town in terms of new housing and the expansion of Free Entitlement from 15 hours to 30 hours in 2017.

Primary School

North Bradley has a successful Primary school, recently rated 'Good' by Ofsted and catering for pupils from ages 4-11. The School provides much more than simple primary education; running a series of clubs and organising events in the village, the School is at the heart of the community. It is located in the older core of the village, near to the parish Church. The school has its own playground, wildlife, gardening area and sports field.

There are currently around 180 pupils at the school, which has been extended a number of times, most recently to add a kitchen. Currently the school is full and demand is strong. The expected growth of Trowbridge, added to a strong though fairly constant local birth rate, will create a huge increase in demand – however this is planned to be absorbed by new primary schools on the East side of the Town.

Secondary Schools

There has never been a secondary school facility within the parish, but most children at the primary move on to secondary education at either John of Gaunt School or the Clarendon Academy a short distance away in Trowbridge. A smaller number select from the large number of Independent Schools in the area. Capacity of the existing schools will not be

enough to cope with rising demand (mainly from new housing) after 2020. A new secondary school is planned on the east side of Trowbridge.

Higher and Adult Education.

Wiltshire College has a campus nearby in Trowbridge and there is an adult education centre in Trowbridge based at County Hall and managed by Wiltshire Council. This offers a comprehensive range of courses from general interest to ones suitable for changing or progressing a career.

Attainment

Wiltshire's education attainment levels are broadly at or above the National Average. Close to 70% of Wiltshire students achieved 5 GCSEs graded A*-C in 20/14/15. This compares well against the national average (64.9%). The county is ranked 41 nationally out of 152 counties. 2,995 individuals achieved a level 3 qualification by 19 in 2015. This was above the national average (57.4%), as well as better than Wiltshire's statistical neighbours (57.81%). Wiltshire is ranked 50. This data is sourced from the LAIT September 2016 showing March 2016's data for people aged 19 in 2015.

SEA Objective	Assessment questions. Will the option/proposal help to...
Service centre provision (including education)	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<ul style="list-style-type: none"> • Promote the development of a range of high quality, accessible community facilities? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Support educational provision in the area?

Transport

Most residents in North Bradley own and use a private car or motorcycle – in fact in 2011 there were, according to the Census, 1219 vehicles owned by 727 households. The volume of all traffic on Wiltshire's roads fell slightly following the economic crash of 2008, but is now rising again. Overall, there was a 12.5% rise in total vehicle miles between 2000 and 2015 from 2,148,246 to 2,416,956. During the same period the distance covered by HGV's fell by 17.3%. This may come as a surprise to residents (an HGV part-demolished the village pub in 2014), but could reflect the recession during the middle of this period.

The HNS indicated that most residents commute to work over some distance:

The distance travelled to work can also be a good measure of the sustainability of local housing development, as more people working locally can indicate an ongoing need for local housing. The table below shows how far people in the respondents' households travelled to work:

Table 1

Persons in household	Distance to work				Total
	Up to 2 miles	2 - 10 miles	10 - 50 miles	50 miles +	
Person 1	28	54	30	10	122
Person 2	15	31	28	2	76
Person 3	3	4	3	0	10
Person 4	3	2	1	0	6
Person 5	1	0	0	0	1
Total	50	91	62	12	215

These results suggest a mixed level of sustainability for new housing development in North Bradley, indicated by the survey respondents' access to local sources of employment. While 66% of the households' working members usually travel less than ten miles to their place of work, 34% travel more than that, suggesting a potential lack of more local sources of employment.

In terms of local traffic levels, there is a local count point, on the A363, apparently near to the Longs Arms, which records traffic flows. Surprisingly this records a fall in the Average Annual Daily Flow from 16,315 vehicles in 2000 to 12,806 in 2013. However, this is almost certainly due to the closure of the Virgin call centre in 2011 which employed 450 staff. Because of its location close to the County Town it is unlikely that North Bradley is experiencing less of an actual increase than for Wiltshire as a whole. Certainly, anecdotal evidence suggests that congestion on local roads is increasing at peak times.

In terms of safety, according to Government statistics, the number of road accidents in Wiltshire increased (from 979 in 2011 to 1136 in 2015, a rise of 16% in 4 years). No accidents were recorded in North Bradley village but some did occur on the A363 (especially at the roundabout at the White Horse Business Park, Southwick Road and at Yarnbrook roundabout. Community Speedwatch confirms the presence of speeding vehicles.

However, public transport provision is better than in more remote villages. There is a reasonable bus service providing links to other villages and into Trowbridge. Trowbridge has a railway station. This provides a regular service, usually half-hourly each way Mon-Sat, (hourly on Sundays) provided by Great Western Railway to Bath Spa, Bristol Temple Meads and either Gloucester or Cardiff Central northbound and Weymouth or Southampton and Portsmouth in the south. On an average weekday, there are 60 trains per day travelling from Trowbridge to Bath Spa with the fastest journey time being 18 minutes. On an average weekday, there are 48 trains per day travelling from Trowbridge to London Paddington. The journey time between Trowbridge and London Paddington is usually 2 hours 2 minutes.

There is a reasonable network of paths and bridleways, but no cycleways (See Map as Appendix 6). This is a shame as there is potential to take many journeys off the roads given the proximity of Trowbridge and other villages. Additionally, footpaths are often disjointed, especially where they cross roads. This raises safety and practicality concerns especially for the elderly, children and the disabled. Users of electric buggy / scooters can have a dangerous and difficult time getting around as can people on bicycles.

SEA Objective	Assessment questions. Will the option/proposal help to...
Transport	
Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure enhancements? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents from the road network?

Economy and enterprise

Although living in a rural location, agriculture has not been the dominant occupation for at least 300 years. This is probably due to the availability of better paid work in local industries within the town of Trowbridge; wool, brewing, light engineering (even the manufacture of the Spitfire during WWII) and Local Government. This situation broadly continues, with many residents working in Trowbridge or at the 'White Horse Business Park'. A significant number of people do commute further afield, but this is lower than average for a rural area. This proximity to employment creates a relatively sustainable working pattern, however it could be improved by improved bus services and better paths including upgrades to cycleways.

There are relatively few small businesses within the Parish. However, larger employers exist at the White Horse Business Park on the Norther-Eastern corner of the Parish. While this provides very welcome local jobs, the physical outward expansion of the site towards North Bradley threatens to destroy the last remaining green gap between Trowbridge and the village.

SEA Objective	Assessment questions. Will the option/proposal help to...
Economy and Enterprise	
Promote the economic vitality of North Bradley	<ul style="list-style-type: none"> • Enable and encourage key local business and employment opportunities to stay and grow in North Bradley? • Facilitate running a business from home and homeworking?

Appendix III: Reasonable alternatives assessment

This appendix presents the detailed findings of the assessment of alternative locations for growth within the NBNP area, as established within Section 5 of the main report.

Methodology

For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how options will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.²⁴ So, for example, account is taken of the duration, frequency and reversibility of effects.

Assessment findings

Table AIII-1 below presents the findings for the SEA of the potential site options for the delivery of housing need within the NBNP area.

Table AIII-1: SEA of reasonable alternatives for the location of growth

SEA Theme	1. Land off A363 off White Horse Business Park	2. Park Farm	3. Elm Grove Farm	4. Paddock at Little Common Lane	5. 54 Woodmarsh	6. Southwick Court	7. Organ Pool Farm
Biodiversity	6	3	5	1	2	7	4

Commentary:

²⁴ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

SEA Theme	1. Land off A363 off White Horse Business Park	2. Park Farm	3. Elm Grove Farm	4. Paddock at Little Common Lane	5. 54 Woodmarsh	6. Southwick Court	7. Organ Pool Farm
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A HRA screening of site nearby to Site 1 and Site 6 (17/03269/OUT) has identified that development in this location could adversely impact on the Bath and Bradford on Avon SAC, which provides a home to a number of rare and protected species of bat, including Bechstein’s bat. Development at these sites is therefore considered to have the potential for significant negative effects on biodiversity. The HRA screening identifies that any medium-scale development is likely to cause disturbance, and as such it is considered that Sites 1, 2, 3, 6 and 7 have the potential for significant negative effects.

Whilst development at any of the site options has the potential to disturb natural and semi natural habitats and/or affect bat species (and thus the Bath and Bradford on Avon SAC), the smaller sites (sites 4 and 5) are of a lesser scale and located within the settlement area so as to minimise this impact. Sites delivering larger scale development are also considered to contribute to negative effects of greater significance through the associated increased levels of noise and light pollution affecting key protected species in the area.

All of the site options fall within a SSSI Impact Risk Zone. For Sites 2, 6 and 7 the type of development proposed is not identified as requiring further consultation with Natural England. For the remaining sites however (Sites 1, 3, 4, and 5), all planning applications (except householder) outside or extending outside existing settlements/ urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings and structures will require further consultation with Natural England.

Sites 3 and 6 lie adjacent/ in close proximity to Deciduous Woodland Priority Habitats, and contain hedgerows or trees that connect to this habitat. Development should seek to retain and enhance ecological connectivity to avoid the potential for indirect minor negative effects. Considering the HRA findings alongside this potential to disturb ecological connectivity, development at site option 6 is considered to have the greatest potential for negative effects of greater significance on biodiversity.

Land and soil resources	5	3	7	1	2	6	4
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Commentary:

Development at any of the site options will result in the loss of greenfield land, with the potential for long term minor negative effects in terms of efficient land use. It is considered that the larger the site, the greater the significance of these effects (in terms of ranking the sites).

Development at the sites will also result in the loss of agricultural land, however this is predominantly Grade 3b and thus not ‘best and most versatile agricultural land’; development is therefore considered to have the potential for long term minor negative effects on soil resources. The land at Southwick Court (Site 6) is identified as ‘not surveyed’ and as such there is an element of uncertainty for this site.

Water resources and flood risk	1	1	1	1	1	2	1
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Commentary:

All of the site options, except Site 6, are not located within Flood Zones 2 or 3, and as such avoid development within an area of flood risk; with the potential for long term positive effects.

The western half of Site 6 (Southwick Court) is located partially within Flood Zones 2 and 3 (predominantly 3) which surround the Lambrok Stream. Whilst development could avoid flood risk areas around the northern border of the site, the stream runs north-south through the site which may

SEA Theme	1. Land off A363 off White Horse Business Park	2. Park Farm	3. Elm Grove Farm	4. Paddock at Little Common Lane	5. 54 Woodmarsh	6. Southwick Court	7. Organ Pool Farm
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make mitigation more difficult – particularly considering future flood risk as a result of climate change. Development also has the potential to affect the water quality of the stream, and it is recommended that Sustainable Drainage Systems are required for development to minimise impacts associated with surface water run-off. In light of these findings, the site is identified for a potential significant negative effect; though it is recognised that mitigation may be able reduce this to a residual minor negative effect.

Site 3 is subject to significant extents of surface water flood risk across the northern part and north/western border of the site. The remaining sites either contain or are adjacent to smaller areas of surface water flood risk; this is most pronounced in Sites 1 and 6, and least pronounced at sites 4 and 7. Mitigation, including the use of Sustainable Drainage Systems can reduce the potential negative effects and lead to a residual neutral effect.

Climate change	5	3	7	1	2	6	4
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Commentary:

As noted in the transport assessment section; all of the sites provide opportunities to support accessibility to sustainable transport modes, and support enhancement to transport infrastructure including active travel opportunities. It is considered that the larger the scale of development, the greater the opportunity to deliver infrastructure improvements which can be directed towards improving the sustainability of transport infrastructure. However, it is also considered that the larger the scale of development, the greater the potential for increased car usage and impacts on local highway networks and air quality. The overall effects are considered uncertain at this stage.

All of the site options are greenfield land and will result in the loss of natural or semi natural land – the provision of enhancements to green infrastructure networks to support adaptation to the potential effects of climate change will be vital to sustainable development in this respect. It is considered that the greater the loss of natural land, the greater the need for green infrastructure improvements, and the greater the potential therefore for negative effects on climate change in the longer term.

Historic environment	3	1	2	3	2	1	1
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Commentary:

One of the site options – Option 1 (Land off A363 off White Horse Business Park) contains designated heritage assets in the burial ground of the former Baptist Chapel; the Grade II Listed ‘Two Monuments in Burial Ground of Former Baptist Chapel’ and the Grade II Listed ‘Gateway to Burial Ground of Former Baptist Chapel’. The Site is also adjacent to two further Listed Buildings (Kings Farmhouse and Willow Grove). Development therefore has the potential to affect the designated heritage assets and their settings. Mitigation will be required to reduce the extent of the potential negative effects; and it is considered that development also has the potential to enhance the setting of the designated heritage asset. The potential effects of development are ultimately dependent upon design, and layout and lower level assessments. It is recommended that policy requires a heritage impact assessment and mitigation strategy prior to any development. Taking a precautionary approach it is considered appropriate to identify at this stage however the potential for significant long term negative effects on the historic environment.

Sites 4 and 5 are also located in close proximity to the same Listed Buildings (at the burial ground of the Former Baptist Church), and Site 4 also lies adjacent to another Listed Building at Kings Farm; the Grade II Listed Kings Farmhouse. Site option 3 (Elm Grove Farm) is also located in close proximity to the Grade II Listed Drynham Lane Farmhouse. Again, development at these sites has

SEA Theme	1. Land off A363 off White Horse Business Park	2. Park Farm	3. Elm Grove Farm	4. Paddock at Little Common Lane	5. 54 Woodmarsh	6. Southwick Court	7. Organ Pool Farm
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the potential to affect the setting of the heritage assets – both positively and negatively – and the effects will ultimately depend upon development design and layout and mitigation measures such as screening. It recommended that policy provisions require a heritage impact assessment and mitigation strategy prior to development at these sites also.

Concerns over the potential scale and layout of development at Site 4 have also been raised by Historic England (in response to the SEA Screening Assessment), thus reiterating the need for further heritage impact assessment at this site, given these objections however, it is recognised that at this stage that there is the potential for a significant negative effect at this site.

The remaining sites (Sites 2, 6 and 7) do not contain and are not located adjacent to any designated heritage assets, and are not considered likely to affect the setting of designated heritage assets.

Landscape	3	1	3	1	1	2	1
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Commentary:

Development at Sites 1, 3 and 6 will significantly reduce the open space/ countryside between Trowbridge and North Bradley, and will alter the townscape of North Bradley significantly by reducing its identity as separate from Trowbridge.

The Landscape and Visual Setting Analysis (LVSA) for the proposed landscape gap at North Bradley has identified that development at Site 6 could weaken the sense of separation between the village and Trowbridge. Landscape features at the site also contribute to wider SEA objectives/ themes; for example boundary hedgerows and tree lines, and Lambrok Stream support ecological objectives, and the moat and grounds at Southwick Court support the historic environment. Development at this site is therefore considered to have the potential for significant negative effects for this SEA theme and for inter-relationships between themes. It is recognised however, that the policy provisions within the HSAP seek to reduce the extent of these effects and include requirements for; detailed Heritage Impact Assessment, contributions to the delivery of the Trowbridge Recreation Management Mitigation Strategy, and the retention of key features supported by buffers and ecological corridors. As such the residual effects are not considered likely to be significant.

Development at Site 3, whilst avoiding encroachment through its enclosure by existing development as outlined in the HSAP; if built out the site would extend the built form of Trowbridge so as to envelop White Horse Business Park and create an urbanised extension of Trowbridge wrapping around the north and east of North Bradley.

Development at Site 1 would also close the landscape gap that separates the village from White Horse Business Park, and the implications this has for the ‘villagescape’ are significant.

Furthermore, if both Site 1 and Site 3 are developed, the cumulative effects would result in amalgamation with Trowbridge through a complete loss of landscape gaps in the east of the village; it is therefore considered that there is the potential for significant negative cumulative effects on this SEA theme.

In terms of the effects outlined above, mitigation measures to reduce these effects, including appropriate landscape buffers and enhancements as recommended within the LVSA will contribute to reducing the extent of the potential negative effects; however it will be important for development at Sites 1 and 3 to consider cumulative impacts and potential ways to maximise landscape corridors through connectivity.

The remaining Sites (Sites 2, 4, 5, and 7) have greater potential to integrate with the village and

SEA Theme	1. Land off A363 off White Horse Business Park	2. Park Farm	3. Elm Grove Farm	4. Paddock at Little Common Lane	5. 54 Woodmarsh	6. Southwick Court	7. Organ Pool Farm
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avoid significant negative effects on the landscape surrounding the settlement. The sites can support high quality design that complements the villagescape with the potential for long term minor positive effects in this respect.

Population and housing	3	5	1	7	6	2	4
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Commentary:

Each site option will deliver new housing to meet identified needs with the potential for long term positive effects. The smaller sites (Sites 4 and 5) will contribute towards meeting the identified local needs and in particular are above the threshold to deliver a percentage of affordable housing. These sites will also suit community aspirations for smaller sites.

Development at Site 6 will meet the locally identified needs for affordable housing on one site with the potential for significant long term positive effects.

Whilst the larger sites (Sites 1, 2, 3, 6 and 7) are less compatible with local community aspirations, they could contribute significantly towards meeting the wider needs of Trowbridge and are also considered to have the potential for long term significant positive effects in terms of housing.

In terms of ranking, at this stage a rudimentary approach is taken where it is considered that the delivery of higher levels of housing could lead to positive effects of greater significance in terms of meeting housing needs, and providing a range of housing types, sizes and tenures to enhance the current housing stock – in a relatively accessible location.

Community wellbeing and health	2	1	3	1	1	3	1
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Commentary:

Development at Sites 1, 3 and 6 will significantly reduce the presence of open space in the north of the Plan area. This is likely to negative effect community health and wellbeing in terms of access to the countryside and areas of open space for recreation. At Sites 3 and 6 this is also considered likely to extend the effects to the local community of Trowbridge who are also likely to rely on this space for recreation and access to natural spaces. As such, it is considered that development at these sites has the potential for significant long term negative effects without significant mitigation in the form on site provisions of natural spaces.

All the site options are considered to support development in a relatively accessible location, and provide opportunities for active travel with the potential for positive effects on health and wellbeing in this respect.

Service centre provision (including education)	1	3	6	5	4	6	2
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Commentary:

The provision of new, or enhancement to existing communities facilities to be delivered through development at any of the site options is unknown at this stage, though it is considered that all of the site options have the potential to contribute to some extent. At this stage of the assessment a rudimentary approach is taken where the larger the scale of development, the greater the potential for service and facility provisions or enhancements.

However, development at Sites 3 and 6 are considered less likely to integrate with the existing

SEA Theme	1. Land off A363 off White Horse Business Park	2. Park Farm	3. Elm Grove Farm	4. Paddock at Little Common Lane	5. 54 Woodmarsh	6. Southwick Court	7. Organ Pool Farm
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settlement area of North Bradley given their closer relationship to Trowbridge at its settlement edge. As such these sites are considered less likely to support the vitality of the village, or contribute to objectives to promote social cohesion, with the potential for minor negative effects.

Transport	1	2	?	2	2	?	2
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Commentary:

Development at each of the site options is considered likely to contribute to increased traffic on the local highways network to some extent. The larger the scale of development, then the greater the impacts are forecasted to be. However, this needs to be considered alongside the potential to support access to sustainable transport modes and opportunities for active travel, in what is considered a relatively accessible location supported by the Principal Settlement of Trowbridge.

Development at Site 1 could provide significant opportunity to enhance sustainable travel routes, particularly active travel opportunities, between the main settlement area and White Horse Business Park to enhance access to local employment opportunities with the potential for significant long term positive effects.

The sites along Woodmarsh Lane (Sites 4 and 5) are particularly well connected to the existing bus route providing good access to Trowbridge and the main settlement area. It is also expected that development at Site 7 could provide connections to existing public transport routes along Southwick Road.

Development at Park Farm (Site 2) is slightly further removed from the main public transport routes through the settlement area; though not so far as to discourage sustainable transport options and development at this site has the potential to enhance active travel opportunities in the north west of the settlement area.

Sites 3 and 6 are separated from the main settlement area of North Bradley and new residents would likely to rely on Trowbridge transport infrastructure in terms of transport connections and active travel opportunities. Given the potential scale of development at these sites, they are more likely to bring forward transport infrastructure improvements; however as to what extent these improvements would be directed at North Bradley and Trowbridge is unknown at this stage.

Overall all of the site options present merits. Sites 4, 5 and 7 can connect to existing public transport at a scale to be sufficiently integrated and support viability. Site 2 can provide slightly further removed connections to the main transport routes and development is at a larger scale thus providing greater opportunity to secure transport infrastructure improvements. Site 1 offers significant potential to increase accessibility in the east of the main settlement area to directly connect with the main employment area within the Plan area, and the larger scale of development at this site could also provide greater opportunities to secure transport infrastructure improvements. As noted above, whilst development at sites 3 and 6 are of a large scale to bring forward benefits, to what extent these would be directed towards North Bradley is uncertain at this stage.

Economy and enterprise	1	4	2	3	3	5	4
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Commentary:

None of the site options are known to be proposing the development of new employment land and as such no significant positive effects for this SEA theme are expected. Development at any of the site options will also not result in the loss of any existing employment land and as such no significant

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negative effects for this SEA theme are expected.

However, development at Sites 1 and 3 could provide new homes with excellent access to the main employment area within the Plan area; White Horse Business Park – and support its ongoing vitality and viability in this respect. Sites 4 and 5 are also considered to have good access to this employment area, though are more related to the settlement area and provide less opportunity to enhance access across the wider space that surrounds the employment area.

Development at Sites 1, 2, 4, 5 and 7, given their ability to integrate with the existing urban form of North Bradley, are also considered likely to support the ongoing vitality and viability of local services, facilities and retail opportunities in the Plan area.

Given the potential for site 1 to both integrate to support the economic function of the settlement, and provide new homes in excellent access to existing employment areas, it is considered to have the greatest potential for positive effects of greater significance than the other site options.

Summary:

Whilst the larger site options (Sites 1, 3 and 6) perform better in terms of delivering housing numbers and supporting the wider Community Area housing needs (particularly those of Trowbridge) and delivering new infrastructure, this has to be considered in terms of the wider context. The housing would be provided in an area subject to significant constraints, such as protected bat species which are affected by the cumulative effects of growth. Large scale growth opposes community aspirations for smaller sites, and there are localised impacts in site allocations in retaining a separate identity from Trowbridge. Larger growth is also considered to increase the potential for, or extent of, negative effects associated with; the efficient use of land and protection of soil resources; surface water run-off; impacts on local highways networks and the associated effects on air quality; and the loss of open land for recreation. The potential for significant negative cumulative effects on the landscape and village identity are also identified should both Site 1 and Site 3 be bought forward for development.

Given the ecological sensitivity of the Plan area, it is recommended that development proposals for any of the site options are accompanied by ecological impact studies and mitigation strategies that contribute to the wider aims of bat species preservation.

It is considered that small scale growth that integrates with the settlement however can support improvements to transport infrastructure, and maximise opportunities to enhance active travel within the NBNP area. Small scale growth focused around the existing settlement area (achievable at Sites 2, 4, 5 and 7) could allow the settlement to grow sustainably, without detracting from the character and identity of the village or the wider setting of the Parish.

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