



Bradford on Avon Town Council's comments on the Local Plan

Introduction

We have divided our comments and suggestions as follows:

- [General comments on the Local Plan](#)
- [Comments on pages 174 to 176 of the plan – the pages that focus on Bradford on Avon](#)
- [Comments on the appendix to the plan: Planning for Bradford on Avon](#)
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- [Comments on Policy 3 – the reserve sites policy in the plan](#)
- [Allocated sites](#)
- [Alternative sites for the development of the town – and neighbourhood planning](#)
- [A summary of the town council's comments](#)
- [Comments on the consultation process](#)

Notes

- References to the plan or the Plan mean the Wiltshire Local Plan.
- References to Bradford on Avon's Neighbourhood Plan are all written out in full for clarity.
- References to the town council mean Bradford on Avon Town Council.
- References to Wiltshire Council are all written out in full for clarity.
- Quotes from the Local Plan are all contained by quotation marks at the start and of the quote: "..."

General comments on the plan

The Local Plan contains important aspirations for the county and for Bradford on Avon – and on balance, it is well intentioned.

Underneath the aspirations and the principles, however, we are concerned that the plan fails to set out a practical strategy for how it intends to meet its objectives and policies.

There is a lack of meaningful and important detail to some of the plan – and there appears to be a lack of evidence-based support for some of the decisions in the plan, particularly regarding the allocation of development sites for housing.

For instance - in Bradford on Avon - there is an assertion that the town's residual housing requirement of 80 homes should be able to be met through small and medium sized sites peppered around the town. However, the plan fails to identify and allocate any sites for the required houses.

The reserve site identified in Policy 3 is of significant concern to the town, too.

The prospect of development at the former golf course has come up before – and the development of the site has proved to be and continues to be deeply contentious and unpopular.

We also believe doubt the viability of this site for the future development of Bradford on Avon – and we certainly doubt whether it can deliver affordable homes in the town.





Comments on pages 174 to 176 of the Local Plan – which focus on Bradford on Avon

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Bradford on Avon Market Town

Pages 174 to 176

Page 174 – point 4.298

Suggested changes:

Replace “green belt” with Green Belt for consistency across the document – and to match the Countryside Charity’s favoured use of the term.

Suggested change to the text to reflect the draft town vision and Bradford on Avon’s Neighbourhood Plan:

Bradford on Avon is a constrained settlement and has limited opportunities for development and expansion, largely due to the town’s topography and its natural landscape – as well as the surrounding Green Belt. The plan expectation is that a good proportion of the town’s housing needs over the plan period will be met through sites identified through the neighbourhood plan review, with a focus on redevelopment opportunities within the settlement boundary.

There are no employment sites allocated through the plan as the identified requirement is small, and it is anticipated that it can be met by sites elsewhere in the Trowbridge Area. The neighbourhood plan review may identify sites suitable for mixed use development, though.

Page 174 – point 4.299

Comment:

The town council has significant concerns about the former golf course being identified as a reserve site.

These are detailed in our [comments on Policy 3](#) of the plan.

Pages 174 and 175 – Policy 57

Suggested change to the text to reflect the draft town vision and Bradford on Avon’s Neighbourhood Plan:

Development at Bradford on Avon will:

1. Deliver employment growth and retain existing employment sites to reduce commuting out of the town.
2. Provide affordable housing to rent and buy to reduce the high levels of need in the town.
3. Improve air quality within the town, particularly within the Air Quality Management Area.
4. Value, conserve and enhance the character and history of the town’s architecture.



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Pages 174 to 176

5. Value, conserve and enhance the biodiversity and character of the town's landscape setting - and its green and blue infrastructure.
6. Improve how pedestrians and cyclists experience the town.
7. Achieve high quality design in new buildings and the built environment, reflecting the unique setting and architecture of the town.
8. Address the climate and ecological emergencies.

Over the plan period (2020 to 2038) approximately 140 homes will be provided in Bradford on Avon:

- Some of these 140 homes have already been built. Others have plans and permissions to be built.
- Less these homes, the remaining number of homes required to 2038 in Bradford on Avon is 80.
- These 80 homes will be delivered on sites identified and supported through the neighbourhood plan review process.

The following Principal Employment Areas will be supported in accordance with Policy 65 (existing employment land):

- Elm Cross Trading Estate.
- Treenwood Industrial Estate.

Page 175 – title

Suggested change:

Change to Bradford on Avon Strategic Site (removing the hyphens from the town name)

Page 175 – figure 4.42

Suggested changes:

Either by additions to policies map – or by including another map here – show:

- The town's designated Local Green Spaces.
- The Cotswolds Area AONB
- The Conservation Area

Why:

As per the National Planning Policy Framework (NPPF), designated Local Green Spaces have policy protection equivalent to the Green Belt and are therefore a significant designation that should be shown.

This map should also show the Cotswolds Area of Outstanding Natural Beauty and the Conservation Area since these will both shape and inform planning in the town.



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Bradford on Avon Market Town

Pages 174 to 176

Page 176 – point 4.304

Suggested changes:

The town council has started reviewing the Bradford on Avon Neighbourhood Plan – and issued a call for sites in October 2023 to inform the review.

Change “green belt” to Green Belt for consistency.



Comments on the appendix to the plan: Planning for Bradford on Avon

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Appendix: Planning for Bradford on Avon

Pages 1 to 31

Page 3 - table

The table at the top of the page talks about “significant development” of the town. This seems contrary to the aspirations and objectives described elsewhere – and is perhaps the wrong adjective to use.

Suggested change:

Remove the word significant.

Page 3 - map

Suggested changes:

We would like to see the town’s 7 designated Local Green Spaces (LGSs) included on a map in the Environment section.

This could be by adding the LGSs to figure 1 on page 3; or by including a second (dedicated) map at this point in the document.

The designated LGSs are an important, valued and vital part of the town’s natural environment – and the NPPF makes clear the importance of designated LGSs.

Page 3 - title

Suggested change:

Retitle figure 1 as: Environmental and landscape constraints and designations in Bradford on Avon.

(This change includes removing the hyphens from Bradford on Avon for consistency across the plan)

Pages 7 and 8 – Place Shaping Priorities (PSPs)

Suggested changes:

Add the following PSPs.

Or incorporate them into the existing PSPs to better reflect the draft town vision and Bradford on Avon’s Neighbourhood Plan:

- **Climate Emergency & Ecological Emergency**

- Minimise the impact of future development in the town to support the town council’s climate and ecological emergency strategy and help the town become carbon neutral by 2030.

- **Transport infrastructure and sustainable travel**

- Ensure infrastructure improvements and encourage sustainable travel methods to reduce traffic congestion (and improve air quality in the town centre)



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Appendix: Planning for Bradford on Avon

Pages 1 to 31

▪ **Green & Blue Infrastructure**

Ensure new development connects to and protects green and blue infrastructure assets in the town; and protects and enhances bat colonies and bat habitats in the town.

Page 9 - title

Suggested change:

Remove the hyphens from Bradford on Avon in the figure 4 title.

Page 10 – Protecting the environment text

Suggested change:

Capital letters and spaces for Green Belt (so this is consistent with the other uses of Green Belt in the plan)

Page 10 – title

Suggested change:

Change the title for figure 5 to: Calculating how many homes need to be planned for in Bradford on Avon to 2038

Page 12 – Selecting sites

Comment:

The plan recognises that potential access to the former golf course could increase traffic on Trowbridge Road and traffic going to Bath (which would likely go through the town centre's Air Quality Management Area – and over the town bridge)

We agree with the plan's statement that this is "a notable weakness" – and would add that this has contrary implications for the town's PSPs, especially PSP 3, PSP 5 and PSP 7.

It would also have implications for the additional PSPs we've suggested, notably the PSP for transport infrastructure and sustainable travel.

As such, this is a significant concern for the town and the town council at a time we're working with Wiltshire Council on the transport concerns and issues in Bradford on Avon.

Page 12 – What development is proposed?

Suggested changes:

Green Belt instead of green belt.

Western Wiltshire Green Belt instead of West Wilts Green Belt.

Suggested change to the text:

Along with the topography of the town, the main constraint to development and to the outward urban expansion of Bradford on Avon is the Green Belt.



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Appendix: Planning for Bradford on Avon

Pages 1 to 31

Page 12 – Reserve site

Comment:

The town council has significant concerns about the former golf course being identified as a reserve site.

These are detailed in our [comments on Policy 3](#) of the plan.

Suggested change:

The town council has started to review the adopted Neighbourhood Plan for Bradford on Avon. This has included a call for sites.

Pages 14 and 15 – Role of neighbourhood planning

Comment:

We believe we will be able to identify and support suitable sites for the future development of the town by reviewing the Bradford on Avon Neighbourhood Plan.

There is more detail on this on our comments on the role of [neighbourhood planning](#).

General comments on the planning for Bradford on Avon detailed in the Local Plan.

We find much to commend in the stated priority for Bradford on Avon: “a moderate scale of growth, to help sustain and enhance current levels of services and facilities and promote better levels of containment, whilst maintaining the historic and landscape values of the town.”

We also agree with the observations that there are significant constraints that will influence and limit the future development of the town, including:

- The river and the canal – with the river effectively creating a north and south to the town.
- The topography of the town.
- The natural landscapes and habitats of the town and the surrounding areas.
- The existing planning designations and protections.

We also agree with the assessment that the town has one of the most attractive town centres in Wiltshire – and that the historic core of the town should be maintained and enhanced. Conserving and valuing the heritage of the town in our built environment is an important part of our draft town vision.

We are happy that the plan aims to provide growth on a modest or small scale – including (where and when possible) local employment opportunities.



And that the plan recognises that we have a unique town centre with a niche role in the county – one that is complemented by and different to Bath and Trowbridge.

We also largely agree with the intentions and sentiment of the 7 Place Shaping Priorities (PSPs) – but feel these could be added to.

Comments on transport

Quotes from the Local Plan:

- “A range of viable, efficient, sustainable transport alternatives will have been provided to reduce reliance on the private motor vehicle.”
- “Improvements to footpaths, cycleways and public transport can be provided in conjunction with development.”
- “New developments must be connected to the town centre with new and improved bus routes, pedestrian and cycling routes.”
- “The implementation of the Bradford on Avon Cycling and Walking Infrastructure Plan will play a key role in supporting measures to reduce car dependency in the town centre.”

These are all commendable aspirations – but the plan doesn’t make it clear how they will be achieved. Our concern is that if this level of detail and clarity isn’t included in the Local Plan, it may not be included anywhere else.

A question we’re often asked is whether we can have a 20mph posted speed limit through the entire town to make the roads safer for everyone.

The plan acknowledges that future development(s) will bring about an increase in traffic but does not provide any detailed information to explain how the additional traffic will be managed. The plan also says the air quality in Bradford on Avon needs to be improved – but lacks clarity about this will be achieved.

The Local Plan should prioritise more sustainable methods of transport.

Comments on climate and Wiltshire Council’s net-zero strategy

“There is a need to address climate change and achieve carbon reduction.”

There is no mention of carbon budgets and no evidence base assessing the carbon emissions that the plan will give rise to, or whether the plan’s policies are consistent with Wiltshire’s Climate Emergency Declaration (net-zero by 2030)

The Sustainability Appraisal does not reference the removal of carbon sink and it does not deliver the legal requirement to demonstrate its policies will achieve the emissions reduction that Wiltshire Council is committed to.

The documents supporting and informing the plan should include an audit of the predicted carbon emissions over the lifetime of the plan including the impact of new developments.

Comments on biodiversity

The plan says that: “Our environment will have been enhanced through a comprehensive range of measures that include biodiversity, nature recovery programmes, access to quality open spaces and responsible management of natural resources.”



It says it will conserve, enhance, and restore habitats and that the connectivity of the county's green and blue infrastructure, including trees and woodland, will help to capture, remove and store carbon from the atmosphere.

The plan aims to mitigate losses that may occur through new developments but there is no evidence that thorough surveys of existing biodiverse areas and wildlife habitats have been carried out.

Comments on the town's infrastructure

Whilst the plan recognises the need for increased infrastructure in terms of health facilities, schools, recreational facilities etc., there is insufficient information on how this will happen.

We have seen an increase in new homes in Bradford on Avon in the last 10 years – and the town's existing infrastructure has failed to keep pace with this.

- Currently, there are only a small number of surplus places in the town's primary schools and the early years nurseries.
- The town has one single secondary school - St Laurence School – and this has limited scope for expansion.
- Health services are already stretched with only one GP surgery in a building which is not fit for purpose.

Developments in surrounding areas will also impact on shared infrastructure in terms of increased traffic, health facilities, shops, and schools.

There are no details in the plan explaining how these challenges and problems will be addressed - and no records or documentation of any engagement conducted with the various local agencies and stakeholders in Bradford on Avon, such as schools, emergency services, medical services and government agencies.

The provision and design of new homes in Bradford on Avon

The objectives set out in the plan regarding new homes are good – with the overall aim being to “deliver energy efficient buildings and to take opportunities to generate and connect to renewable and low carbon energy infrastructure wherever feasible.”

The plan says it will help Wiltshire's communities tackle and adapt to climate change and have access to the “right housing” – housing that “will meet local needs as well as the changing climate by incorporating exceptional standards of design that enhance the natural, built and historic environment.”

There has been ample opportunity to meet these objectives in the homes recently built in the town - but developments such as Holt Road have been disappointing and characterised by missed opportunities.

This development is notable:

- For **not** featuring solar panels on any of the homes.
- For **not** having green roofs.
- For **not** specifying alternative and more sustainable heating technologies like air-source heat pumps.

If we are to meet net-zero targets, there must be a clear and much more rigorous set of rules which must be adhered to by future development(s)



The set of objectives regarding drainage systems, biodiversity net gains and water efficiency are good - but there is no mention of a case officer to assess the acceptability of new planning applications; or objective standards against which to assess the proposals.

The plan says it will give additional support to community-led renewable energy schemes, but it could go further to encourage and maximise such schemes by setting out suitable areas for such developments and setting specific targets for renewable generation.

There is no detailed strategy explaining how renewable energy generation could supply the growing needs of homes, transport and industry. There is little support for wind generation, only small-scale schemes are deemed to be viable - but there should be further investigation and studies into potential sites in Wiltshire for wind generation on a larger scale.

Lastly, the plan says it aims to provide affordable homes for local people. This is a significant concern across Bradford on Avon – so we are very interested in how this will be achieved; and in ensuring that homes – for people renting and buying - are genuinely affordable.



Assessment and selection of potential development sites

The criteria and evidence used to identify potential development sites is grossly inadequate and seems to go against many of the plan's own declared aims, which include enhancing and retaining existing biodiversity; protecting green and blue infrastructure; reducing road traffic through the town; and providing safe neighbourhoods for children, pedestrians and cyclists.

Comments on Policy 3 – the reserve sites policy

We acknowledge the intentions of Policy 3 – in particular to “help guard against a situation where developers seek to promote speculative greenfield sites.”

Nevertheless, we are concerned that the reserve category in the Local Plan is disingenuous in that it can be triggered by a continued failure to achieve the 5-year land housing supply across Wiltshire. The site is a reserve site for the county rather than the town.

As such, delays or failings elsewhere in the county could become incredibly impactful and detrimental to Bradford on Avon.

(Noting that the requirements for Wiltshire and for the Trowbridge Housing Market Area are likely to necessitate larger developments, too – and such projects could prove more susceptible to delays and complications)

In the same way that Corsham Town Council and Malmesbury Town Council are concerned, we're worried that Policy 3 could result in speculative planning applications if the 5-year housing land supply is not met.

Historically, this is what's happened in Wiltshire - which makes us anxious that there is a high chance of the reserve sites in the plan being developed during the plan period.

These general concerns have been highlighted and heightened by the prospect of the former golf course becoming a reserve site in the plan.

Simply, we don't believe this site is suitable for development.

Comments on Site 3 (SHELA 739)

The former golf course

The reasons given to allocate this site as a reserve site lack any real evidence-based support.

And we're nervous that the only reasons this site has been identified as suitable as a reserve site are:

- That part of the site is outside of the Green Belt.
- A lack of local knowledge about the history and topography of the site.
- Underestimating the community value of the site.
- And that more detailed assessments haven't been completed yet.

Simply, we don't believe that this site is deliverable – and therefore it fails to meet the **effective** element of the plan.

In Policy 57, the site scored well against 3 of the draft PSPs for Bradford on Avon.

However, we are unconvinced that the site would provide a supply of affordable housing for the town.



Historically, there have been questions and concerns about vehicle access to the site. Nothing has changed – and we are concerned that access from Greenland View is not viable. Our opinion is that the site is limited by flood risk.

Our understanding is that there are other factors that will also limit the developable area of the site, too:

- The Wessex Water pumping station and pipework.
- Site contamination. An estimated 25% to 30% of the site could be contaminated, which would necessitate costly mitigation and remediation works.
- A ransom strip along the potential access from Greenland View.

Individually, these factors would likely impact the cost of any development here – making the site less favourable and less deliverable. Which would then impact the affordability of any potential homes on the site.

In combination, these factors are likely to significantly impact the cost of any future development here.

Just as importantly, we would question whether the site can deliver Wiltshire Council's stated biodiversity net gains.

We have concerns about the potential impact(s) to the river, the riverbanks from any development – both during construction and following completion.

The Local Plan webinar on 10 October discussed the site selection process and emphasised that sustainability and deliverability were key elements.

The collection of baseline information for the former golf course site is incomplete and the categorisation of impacts is unclear.

We are also concerned that some of the terminology used in this part of the plan is unclear. For example: what does the term “Moderate (significant) adverse effect” mean?

This is potentially ambiguous when (reasonably – to most people) moderate and significant have different meanings.

Anyone developing this site in the future will have to undertake comprehensive environmental and social impact assessments – and we would like to be assured about who will be responsible for implementing and monitoring the “considerable” habitat enhancements and restorations that would be necessary if this site was developed.

Previous planning applications in 2009 and 2015 were refused on several grounds.

The plan makes no reference to the land's previous use as a landfill - and the potential for toxic emissions or run-off if disturbed.

In fact, the site assessment form suggests that because the site is a greenfield site, “land contamination is unlikely” when local knowledge and local history would suggest the opposite is going to be true.

The land contains many and far-reaching hazardous chemicals below the surface which may leach into the River Avon, endangering the wildlife that has increased since the golf course closed.



It will be extremely expensive for any developer to deal with this problem.

Biodiversity and wildlife at the former golf course

The plan says that:

“Our environment will have been enhanced through a comprehensive range of measures that include biodiversity, nature recovery programmes, access to quality open spaces and responsible management of natural resources.”

It also says that it will “conserve, enhance and restore habitats and that the connectivity of the green and blue infrastructure, incorporating trees and woodland, will help to sequester carbon from the atmosphere.”

Since the golf course closed, the site has become an important wildlife habitat for birds, butterflies, bats, otters, beavers and river birds.

It is vitally important that this green-blue biodiverse corridor is protected and enhanced.

No ecological studies have been carried out on this site in recent years.

We believe that such preliminary studies should have been done and the results taken into consideration when assessing this site for its suitability for development.

Overall, the plan states that “economical development will be conducted without depletion of natural resources.” We believe that the development of this site would see considerable depletion of natural resources.

The plan equally states that “a site that was likely to lead to unacceptable degrees of harm in terms of traffic and congestion impacts and potential for exacerbation of poor air quality was rejected.” The former golf course being considered as a reserve site is a further example of the plan going against its own stated aims.

In conclusion, we believe there are factors that contribute to this site being less deliverable than the plan asserts.

Local views – and local opposition

When this site was put forward for development in the draft plan several years ago, Wiltshire Council received a huge number of letters and responses objecting to its inclusion.

Why have these views not been taken into account when the plan’s stated intention is “to pull together the comments and advice received from local residents.”

The plan goes further than that, stating that “an important part of developing the Wiltshire Housing Sites Allocations Plan was to engage with the local community and listen to the views they expressed.”

That doesn’t seem to be the case with this site being put forward as a reserve site.

This strength of feeling remains across the town, as well – and we’re submitting a petition in support of our representation that reiterates this, with over 2,000 signatures gathered between 1 November and 21 November asking for the site to be removed from the plan as a reserve site.



Allocated sites

Excluding the reserve site, the plan doesn't identify and allocate any sites for development.

Yet the plan identifies there is a need for 80 homes in Bradford on Avon by 2038.

If this means that we will be able to identify sites for future development through the Bradford on Avon Neighbourhood Plan then we would welcome this opportunity.

Especially since the alternative would seem to be a planning application for the former golf course citing Wiltshire Council's failure to meet the 5-year land supply in Wiltshire.

Alternative sites for future development – and the neighbourhood plan review

We believe there are sites in Bradford on Avon that are more suitable for the future development of the town.

We have started reviewing the town's neighbourhood plan – and as part of this, we have issued a call for sites in Bradford on Avon.

This has already seen alternative sites submitted.

The Local Plan recognises and stresses the importance of neighbourhood planning and communities - and we would welcome the opportunity to fully consider and explore the sites being submitted to the town council.

We expect to do this by way of independent assessments and by working with Wiltshire Council's Planning team, including Wiltshire Council's officers supporting our neighbourhood plan review.

The independent assessments would include bat experts to fully consider foraging, migration paths and roosting.

We're very hopeful that through the neighbourhood plan review process, we'll be able to identify sites to meet the housing needs of the town.

- This could be the small and medium sized sites talked about the plan – some of which may be brownfield sites.
- The call for sites and the neighbourhood plan review might equally identify some larger sites that could be suitable for the future development of Bradford on Avon.

As such, we may end up in the position that our reviewed neighbourhood plan identifies sites capable of offering more than the 15 homes calculated as the neighbourhood area requirement.



Summary of Bradford on Avon Town Council's comments

As shown by the petitions, the former golf course remains very unpopular as a possible site for development – and we are concerned that the 'reserve' category in the Local Plan is somewhat disingenuous in that it can be triggered by a continued failure to achieve the 5-year land housing supply across Wiltshire. The site is a reserve site for the county rather than the town.

We are also concerned that development of the former golf course would see the loss of a valued and important green space in the town – including detrimental impacts for the landscape and for wildlife.

For these reasons, we would like to see the former golf course removed as a reserve site in the plan; or for the reserve sites policy to be removed in its entirety.

Through our neighbourhood plan review, we believe we will be able to focus on other sites in the town.

This may include some redevelopment of small brownfield sites. We will also emphasise the importance of smaller living units and more affordable housing in the town.

On balance, we welcome the overall aspirations and objectives - and the improvements in the Local Plan - but we would like to the opportunity to assess other sites as part of the neighbourhood plan review in Bradford on Avon since we feel other sites may be more appropriate for the future development of the town.

We would also like to ask that the town council is invited to participate in any plan hearing sessions that relate to Bradford on Avon.

Comments on the consultation process

We have been encouraging people in the town to have their say on the plan – promoting the consultation at town council meetings, in our newsletters, by email and on social media.

Many of the people we have spoken to in the town have expressed similar views and concerns to those we're putting forward – but these same people have said that the process for commenting on the plan has proved to be too difficult, time consuming and convoluted – and unnecessarily so.

To exemplify this, the instructions on YouTube are not aligned with how the online consultation portal operates. The consultation portal does not allow comments to be assigned to specific clauses of the plan and does not appear to allow submissions to be edited once submitted - even though the confirmation e-mails indicate that this is possible.

As such, we believe that some residents may have been excluded from commenting on the plan.

This was one of the reasons we set up the petition asking for the golf course to be removed as a reserve site.