

**The
BRADFORD
ON
AVON
NEIGHBOURHOOD
PLAN
2013-2026**

Made October 2017

THE BRADFORD ON AVON NEIGHBOURHOOD PLAN

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1 - BACKGROUND

Foreword

This plan is about the future of Bradford on Avon and covers the period to 2026. It has been prepared in the town and reflects the ideas, aspirations and concerns of the community. It seeks to build on the legacy of past generations and point the way towards a positive future.

In 2011, the Localism Act set out to change the way town planning was conducted. It introduced the concept of “neighbourhood planning” which would, ministers said, “allow communities - including residents, businesses and their employees - to say where they thought new houses, businesses and shops should go and what they should look like”.

The channels for expressing these ideas were to be local councils or neighbourhood forums. So at the end of 2012, Bradford on Avon Town Council produced a scoping report outlining studies that had already been undertaken in the area and what they had achieved. This information, together with local responses to it, formed the basis of an agreement to produce a neighbourhood plan.

This plan has been prepared by a steering group set up by the town council and bringing together a range of organisations and individuals representing the various interests that make up the town. The process has involved consultation and discussions with the community using the information obtained to inform the plan making.

This plan does not provide all the answers to our future. There are legal limits to what a neighbourhood plan can and cannot do. Neighbourhood plans will influence development that requires planning permission but cannot deal with issues outside of the scope of planning control.

This means they cannot include matters such as highways, the environmental standards to be applied to new building or the provision or improvement of services. Proposals for a by-pass or one-way traffic system, for example, could not form part of this plan.

Introduction

Bradford on Avon is a remarkable place. Its location, on the south-facing hill slopes of the Avon Valley, is unique and its townscape much admired. The town has made its living in many different ways over the last 1,000 years and the changing fortunes of its industries, institutions and residents have left their mark on its wide variety of historic buildings and spaces.

Like the town itself, the neighbourhood plan is and should continue to be a work in progress. The pressure for change will not stop. So the plan must seek to ensure that, when change happens, we both retain and enhance the special character of our landscape and architecture - taking into account the views of the whole community and make a positive contribution to it.

The plan presented for consultation here has been shaped by national and local planning policies and includes specific information and policies designed to reflect local aims and aspirations. It takes into account the views of the townspeople expressed in earlier consultations.

In the period up to 2026, the Wiltshire Council Core Strategy (WCS) identifies no large-scale developments other than the approved scheme for Kingston Farm. But, while smaller changes may seem less significant, they can have a cumulative effect and must be assessed accordingly. The overall aim of the neighbourhood plan must be to leave the town in good heart for future generations to enjoy.

The planning context

The National Planning Policy Framework (NPPF) sets out the Government’s overarching objectives for the planning system. Its stated objective is to achieve development that is economically, socially and environmentally sustainable.

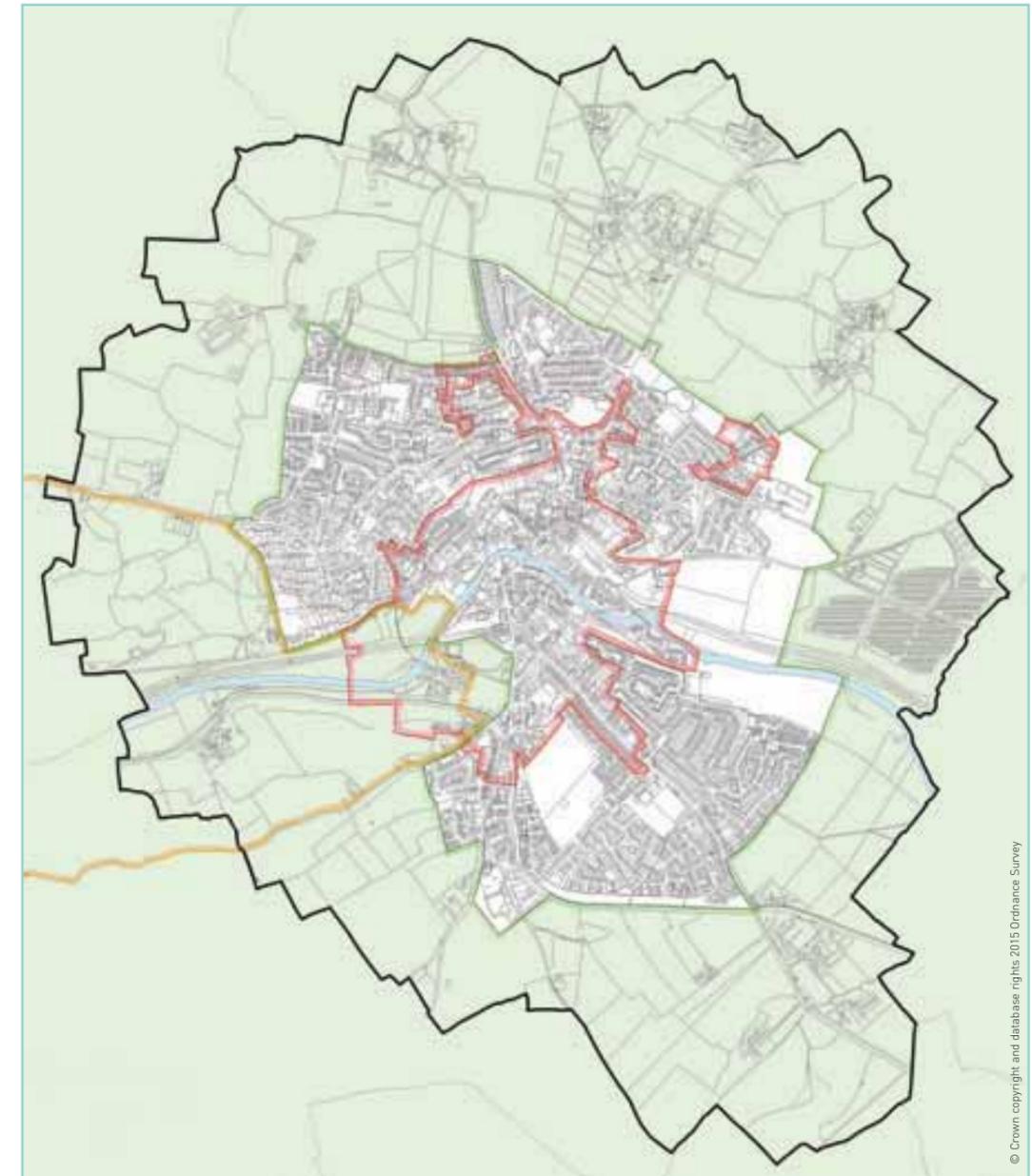
Next in line is the adopted WCS, the principal document governing planning throughout Wiltshire. In addition the Wiltshire Housing Sites Allocation Development Plan Document (DPD) is being prepared to support the delivery of new housing as set out in the WCS.

The third link in this chain is the Neighbourhood Plan, reflecting the wishes and aspirations of the town. Subject to examination and formal approval it will then become an integral part of the planning process.

The Plan Area

The Neighbourhood Plan area was approved by Wiltshire Council on the 18th October 2013 and covers the Parish of Bradford on Avon as indicated here.

The Parish is the central part of the Bradford on Avon Community Area covered by the Bradford on Avon Area Board which includes surrounding parishes, several of which are working on their own plans. So some of the information taken into account in preparing this plan necessarily includes detail from studies of the community area.



Map 1: The Plan Area

- Parish and Neighbourhood Plan Boundary
- Area of Outstanding Natural Beauty
- Conservation Area
- Green Belt

Bradford on Avon Parish

Bradford on Avon is located in the north-west of Wiltshire, approximately eight miles from Bath. The town straddles a meander in the River Avon where the ground on the north bank rises steeply to a height of 200 feet above the valley. Its varying topography, rich history and coherent architecture combine to create a town of remarkable interest, for both residents and visitors. Widely recognised as one of the most important historic towns in the south-west of England, it has several buildings of national significance. Architectural survivals from its Saxon origins through to its 17th and 18th and 19th century industries - first the weaving of cloth, then the vulcanisation of rubber - can still be seen a few minutes' walk from each other.

Protecting the essential quality of the town and its setting and revitalising its economy are key features that this Neighbourhood Plan seeks to achieve. There is limited development in the rural area beyond the town boundary including the separate and distinctive hamlets of Woolley Green, Frankleigh and Widbrook.

The Parish had a population of 9,402 in the 2011 census and covers an area of 862 hectares, of which 72% (619 hectares) is green space.

It has good road, rail and canal links, and is within an hour's drive of Bristol Airport. The main road link, running through its centre, is the A363. This arrives from Trowbridge in the south and then heads north towards Bath. The B3107 runs eastwards from the town centre through Holt to Melksham and beyond. Another route to Bath is provided by the B3108, running west from the top of the northern hillside through Winsley. The B3109 from Frome and the south-west joins the A363 to pass through the town then heads north-east towards Corsham and Chippenham. Other vehicular crossing points of the river are outside the plan area at Staverton to the east and Freshford to the west.

The railway station is on the Bristol to Salisbury line, which runs east-west across the parish. Fast journeys to Bristol take half an hour and there are some direct trains to London. The Kennet and Avon Canal follows a similar route to the railway from Bath to the west but then heads eastwards towards Devizes.

The rural setting and the Green Belt

The built-up area of the town is largely surrounded by the Western Wiltshire Green Belt, which forms part of a much more extensive Green Belt around Bristol and Bath. Its purpose is to check the unrestricted sprawl of urban development, to prevent Bradford on Avon coalescing with Trowbridge and to preserve Bradford on Avon's special historic character and setting. The southern end of the Cotswolds Area of Outstanding Natural Beauty extends along the river valley from the west as far as Barton Farm.

The Green Belt is a major constraint on development. Similarly, the Cotswolds AONB is intended to constrain unchecked development as well as highlighting the quality of the landscape.

How the past has influenced the development of Bradford on Avon

Unlike nearby towns, Bradford on Avon was never granted a charter as a market town. But it has been an industrial town for more than 750 years. This may help to explain why it has relatively few shops compared with towns of a similar size. Though less visible now, the town's industrial character was very apparent right through until the late 1980s; the sight of hundreds of rubber workers clocking off from "the Avon" at the end of the day was more reminiscent of a northern factory town than one on the edge of the Cotswolds.

Bradford on Avon's economic past is relevant to its future in other ways, too. For hundreds of years the dominant industry was wool. It defined the architecture and the feel of the town, with water power being the key to its prosperity. But in the early 18th century - because of the drive towards increasing mechanisation, and, perhaps, too much of a local focus on the wrong kind of cloth - this and other towns in the area faced economic collapse as the industry moved to new factories in the north of England.

In 1848, however, the availability of an eager pool of skilled labour alongside deserted mill buildings led Stephen Moulton, recently returned from the US, and local backers to set up Britain's first rubber factory in the town, powered by a mix of steam engines and water wheels. And the rapidly developing rubber industry came to dominate the economic life of the town for well over a century.

In 1956 Spencer-Moulton, as it then was, became part of the larger Avon Rubber Company, which had originated downstream from Bradford on Avon at Limpley Stoke. But in 1992 - following a period of, at first, substantial growth and then significant restructuring - Avon stopped all production work in the town.

Its global corporate headquarters remained at Manvers House, on the edge of the town's new Kingston Mills housing development, until 2010.

Loss of "the Avon" was a major blow. However, it spawned a number of significant elements of our present-day economy and here the engineering legacy of Stephen Moulton's great-grandson is of particular interest. Dr Moulton, who began work in the family firm after World War Two, designed the ground-breaking suspension system that underpinning the revolutionary design of the 1960s Mini. He also developed the radical small-wheeled Moulton bicycle that is still made in the town and is a worldwide design icon.

In 1982 Anthony Best, who came here to work with Dr Alex, formed Anthony Best Dynamics to supply advanced testing equipment to vehicle manufacturers and suppliers. The expanding company is now a world leader in this field.

Nonetheless, closure of "the Avon" and the protracted negotiations over the future of the Kingston Mills site produced a 20-year hiatus in the economic life of the town. Between 2001 and 2011, census figures show, its population rose by just 72. It became defined, in the 2006 Wiltshire and Swindon Structure Plan, as a "dormitory town". And as a result, more and more employment space was lost to housing.



Old Bradford - new technology

2 - DEVELOPING THE PLAN

Present-day challenges

Over the past decade there has been a growing recognition that Bradford on Avon needs to regain and retain its position as a working town that embraces change. After extensive work by the Town Council and others, the Wiltshire Council Core Strategy now emphasises the need for “development for business and employment uses” and an insistence that “further loss of employment should be strongly resisted”.

Recent years have also seen a notable increase in the number of young families moving to the town, many with high value-added jobs. Many of these involve commuting to other towns and cities while others are in small businesses, often run from home. At the same time, a number of new high-end engineering businesses have taken root. And there has been a steady growth in the number of small, digital-sector businesses such as web design, social media, internet marketing and brand development.

To maintain this sometimes tenuous growth and attract more entrepreneurs and jobs, the town faces a number of clear challenges. Some of these are not of its own making and it will need help in resolving them, e.g. strengthening of both the transport and IT/digital communications infrastructures.

By comparison with many towns of a similar size and general character, Bradford on Avon has a relatively small retail footprint and town centre shopkeepers describe the local retail environment as “challenging”.

Among the challenges they face are the availability of supermarkets, relative shortage of parking and proximity to the greater choice offered to consumers by Trowbridge and Bath. Closure of one of the town’s two banks is also thought to have reduced footfall in the town.

But it is not just retail that faces such challenges. Businesses of all types in the town struggle with how to secure a recovery from the 2008 recession, how to adapt to rapidly changing markets and how to cope with climate change. They must also find ways to deal with a demographic shift, as over the next decade the town’s retired population is forecast to increase much faster than those of working age. The wellbeing of the rural areas and the farming community also need to be considered.

Nonetheless, Bradford on Avon will remain well-placed to contribute to the overall strategic objectives for the county: to broaden the types of employment on offer, to strengthen the skills base, to provide more high-value-added employment and to speed the transition to a low-carbon economy.

Many changes that take place in a town are driven by economics, ownership and in some cases fashion. They do not involve planning decisions, so lie outside the scope of a neighbourhood plan. But what such plans can try to do is highlight aspirations and point to areas of opportunity.

Responding to these challenges the topics of most relevance to Bradford on Avon were identified in a series of consultations and then examined to bring forward the vision.

Your vision for Bradford on Avon

Public involvement is vital to the neighbourhood planning process to ensure the wishes of the local community are taken into account. So in March 2013, a consultation exercise was carried out to identify issues of concern to the people of Bradford on Avon and to find out how they saw the future of the town.

This was put together with the input from earlier studies, such as *Bradford on Avon 2026*, to form the basis of a set of consensual aspirations for Bradford on Avon as a place that:

- gives a high priority to and achieves a high standard in the conservation of the remarkable architectural and historic character of the town using the best of the past to influence the future
- protects and enhances the green areas within the town including the wider landscape setting and at the same time increases biodiversity
- achieves an improved economic balance in the town by facilitating and delivering significant employment growth in new development, and by retaining all existing employment sites, with an emphasis on high value employment

- provides a valuable range of educational, cultural, sports and community facilities, within an attractive and welcoming environment, for all who live and work here and for those that visit the town
- minimises the impact of vehicles passing through the town and improves the environment for pedestrians and cyclists by reducing vehicle/pedestrian conflict, whilst at the same time securing improved air quality
- provides a diverse mix of housing appropriate for all sectors of the community
- achieves high quality design in new buildings and in the public realm that respects and responds to its location
- meets the challenge of climate change and achieves a carbon neutral Bradford on Avon by 2050

The Wiltshire Council strategy for Bradford on Avon is:

“to provide growth on a modest scale and in order to deliver additional employment, thereby helping to improve the self-containment of the town by providing jobs locally. Development will need to meet high standards of sustainable design and should incorporate renewable energy provision, to contribute to the town’s aspirations to be carbon neutral. The strategy will respond to the Community Area’s location (in full or part) within a nationally designated landscape. In the Bradford on Avon Community Area this includes the Cotswolds Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.”

This strategy together with the NPPF sets the framework for the neighbourhood plan.

The vision broadly covers seven categories, which have been explored in detail by volunteer working groups.

How the Plan has been prepared

The planning process seeks to identify a vision for the area - to take from this the key issues - and then turn these into objectives. The plan policies are the mechanism by which objectives can be achieved.

Based on the vision for the town Topic Groups were set up to examine:

- Climate Change
- Community Wellbeing
- Conservation and Design
- Economy and Enterprise
- Green Spaces
- Housing for All
- Transport and Movement

(listed in alphabetical order with no priority implied)

The role of these Groups was to investigate, record and provide assessments of the present situation and to identify key objectives for incorporation into the plan. There are obviously overlaps and these are reflected in the policies that have emerged.

In May 2014 there was further consultation to determine the key issues affecting Bradford on Avon and how these should be addressed in the Neighbourhood Plan. In April 2015 additional consultation took place on the emerging planning policies and ideas.

Separate housing and business needs surveys were undertaken in 2014 to seek to understand local needs and the findings taken into account.

3 - PLANNING POLICIES

Key issues

The result of all these consultations has been, in broad terms, a narrowing of focus on retaining the essential qualities of Bradford on Avon while providing a framework for positive change and a sustainable future.

There is clearly a strong consensus in favour of encouraging employment and business activity while improving the quality of life for all those who live and work here or are visiting the town.

How these objectives can be achieved is to a large extent governed by the town's limited infrastructure and by established planning policies, including those covering the Green Belt. Some development proposals will need to take into account the capacity of the existing schools, health and other services, as well as their potential effects on traffic flows and air quality.

According to the WCS, the town cannot cope with major growth - not least because it has only one river crossing for vehicles. Town expansion to 2026 should, it says, provide growth on a modest scale.

Nonetheless, we can expect continuing pressure both for development outside the town and for further significant changes within the urban fabric. Hence the need for planning policies to ensure that all changes in the town, including new development, contribute something positive for the future.

Plan preparation has included a continued assessment of sustainability issues. The Strategic Environmental Assessment Scoping Report (SEA) includes information on the work undertaken. The plan is accompanied by a Sustainability Appraisal (SA), the purpose of which is to demonstrate the positive effects of the plan and the steps taken to in assessing options.

The challenge in putting together the plan has been to determine how the vision and objectives can be achieved and what planning policies should emerge to ensure that future change and development make a positive contribution to the future of the plan area.

Objectives for the future of Bradford on Avon

These objectives summarise the community aspirations for the town and the policies in the plan provide a mechanism for achieving the objectives.

The principal objectives are:

- to ensure that development in the town is genuinely sustainable and serves local needs
- to protect and enhance the architectural and historic character of the town and its landscape setting
- to concentrate on the provision of housing for local needs
- to ensure that the town has a viable economic future
- to protect and where necessary improve community facilities
- to minimise the adverse effect of through traffic and to improve provision for pedestrians
- to protect and enhance green spaces and biodiversity
- to ensure the continued protection of the rural setting and the Green Belt
- to recognise the need to address Climate Change

An examination of the issues facing the town, as set out in the Topic Papers, provides the framework to bring about positive change.

These objectives form the basis for the development of key planning policies that relate specifically to the Bradford on Avon neighbourhood plan area.

Introduction

Future expansion in Bradford on Avon is controlled by planning policies, including the Green Belt, and by the town's limited infrastructure. The findings of the Wiltshire Core Strategy are that the town cannot cope with major growth; not the least of the constraints being the single river crossing for vehicles.

The Policies of the Neighbourhood Plan provide for sustainable housing growth over and above the indicative requirement in Wiltshire Core Strategy Policy 7.

Although major expansion is not proposed, we can expect continuing pressure for development outside the town and further significant changes within the urban fabric. The planning policies needed for Bradford on Avon are those that will ensure that all changes in the town, including new development, make a positive contribution to its future.

The term "development" has a specific legal meaning when it comes to planning. It covers building, mining, engineering or other operations and also material changes in the use of land or buildings. There are a number of exceptions, including the use of land for farming or forestry and also activities that only affect the inside of buildings unless the buildings are listed. These are not considered as "development" at all and so lie entirely outside planning control.

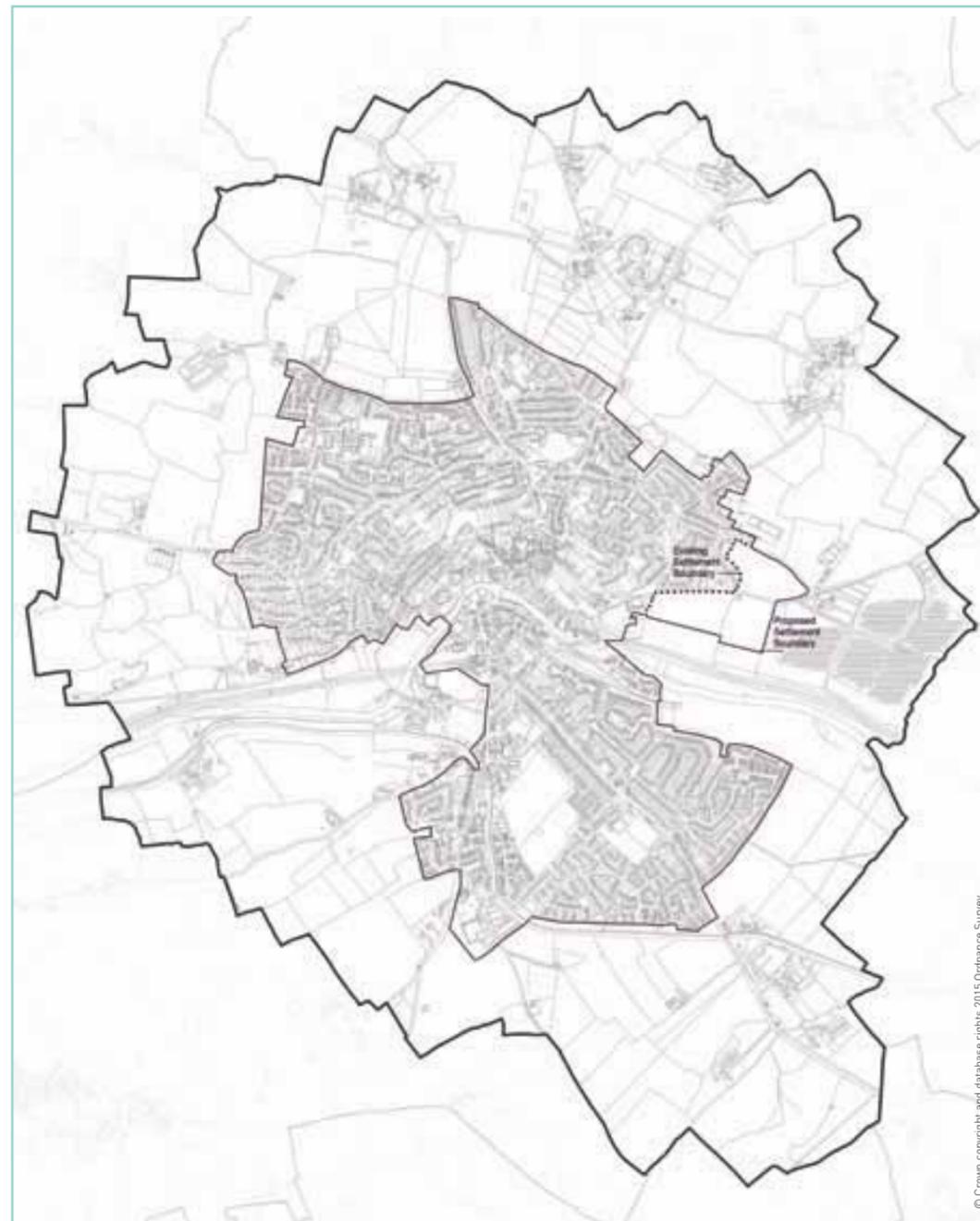
All "development" requires planning permission and this is the basis of the system of planning applications which local authorities operate across the country. However, there are further complications as some development is granted automatic planning permission and so does not require a planning application. This is termed "permitted development" and includes smaller scale house extensions and loft conversions or street works by utility firms and many changes of use. Works to listed buildings are never "permitted development" and will require listed building consent and there are additional restrictions on development in conservation areas.

Policies should not be considered in isolation - they are mutually dependent and apply across the whole plan area. Development proposals will be assessed against all relevant policies in this Neighbourhood Plan.



From St Margaret's Hill

Wiltshire Heights



Map 2: Revised Settlement Boundary

Outer line: Plan Area
 Inner line: Revised Settlement Area

DEVELOPMENT POLICIES

POLICY DP1 - Regeneration and Infill Development

The reuse or redevelopment of previously developed sites and the development of infill sites will be supported.

The Policy seeks to make the most effective use of previously developed land.

THE GREEN BELT

Development policies for the Green Belt are set out in Section 9 of the NPPF. These indicate that the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into one another
- to assist in safeguarding the countryside from encroachment
- to preserve the setting and character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other land

Development in the Green Belt is subject to tight control but there are exceptions and certain development may be permitted where this is shown to be “not inappropriate”. This may include buildings for agriculture and forestry, provision of appropriate facilities for outdoor sport and recreation, minor works to existing buildings or redevelopment of previously developed sites.

Land in the Green Belt within the plan area, and especially open land close to the settlement boundary, is under significant pressure for development and change of use. Inappropriate development is, by definition, harmful to the Green belt and should not be approved except in very special circumstances.



The setting of the town from the north-west

The Green Belt to the south

CONSERVATION AND DESIGN

Introduction

Good design and the protection of the built and natural environment are requirements of the National Planning Policy Framework and the Wiltshire Core Strategy and both documents include further details of the matters to be taken into account. The information in this section outlines how good design needs to be assessed in the Bradford on Avon context and it should be seen as additional to the national and Wiltshire Council design requirements.

The adopted Bradford on Avon Conservation Area Character Assessment 2008 makes reference to the tendency in recent years for owners and developers proposing new buildings to seek neo-vernacular designs, with varying degrees of success. It also indicates that buildings should reflect the time in which they are built and, although period revivals or vernacular styles may sometimes be appropriate, they need to be accurately researched and skilfully designed and executed if they are to be successful. These points remain relevant. Also relevant is the need to explore how high quality sustainable and innovative design can add to the overall quality of development in the plan area.

Changes within the plan area will reflect the economic and social circumstances prevailing at the time and apart from the redevelopment sites already identified there are likely to be new ideas and opportunities. All sites within the plan area provide the opportunity for enhancement provided that a high quality of design and construction is achieved.

How to achieve the required quality will be a matter of debate but it should be an informed debate, not simply a requirement to "be in keeping". The way in which buildings are made to "look right" is in proportion and scale and in the design of details and features. The layout and arrangement of floor plans is also significant. The aspiration for good design should not be restricted to historic areas or in relation to listed buildings but should apply throughout the whole area. The key task is to recognise and build on the positive qualities of the area concerned.

Building in Context published in 2011 jointly by the then English Heritage and the Commission for Architecture and the Built Environment, emphasises the need for high quality design in and provides useful guidelines. To quote "In the final analysis it is true that there is a subjective element in judgements about design quality and people often disagree about what they like. Such differences of opinion and matters of taste should not be allowed to obscure the fact that it is possible to arrive at opinions about design based on objective criteria." This is the basis on which the following policies have been prepared.

OBJECTIVE 1 - to protect, manage and enhance the built environment of Bradford on Avon for the benefit of residents, businesses and visitors and to ensure its continued contribution to the character and economic life of this fine historic town. Also to seek improvements in the design of all work, including new buildings, throughout the plan area.

POLICY BE1 - Development should reinforce local distinctiveness and help create a sense of place. All development should relate to its site and wider setting. Materials used should relate to their surroundings and where appropriate should make a positive contribution to the public realm. Development within the Conservation Area or its setting should take account of the relevant Conservation Area Character Assessment.

POLICY BE2 - Development requiring planning permission should make efficient use of land and integrate with its surroundings by respecting the overall character of the area (guidance is provided in the GS Topic Paper Appendix 18 in this regard). Development should conserve or enhance heritage assets. Bin storage should be screened from view.

Community Action

The Town Council will seek to work with third parties to encourage upgrades to historic buildings to improve their energy efficiency.

This Community Action is not a land use planning policy but sets out key local aspirations. It is based on evidence produced by Historic England and others which states that energy efficiency can be improved by various methods that recognise the essential qualities of traditional building construction and do not cause damage to architectural or historic character. Historic buildings could support roosting bats, therefore applications to upgrade such buildings including roof spaces or cellars should be accompanied by a bat survey and appropriate mitigation provided, where necessary, having regard to Wiltshire Council's HRA Guidance document.

Reasons for these policies

The architectural and historic character of Bradford on Avon and its landscape setting have been recognised as making a valuable contribution to the quality of life for residents, businesses and visitors. The character and quality is also important in maintaining and fostering the economic life of the town. Policies are intended to ensure that future changes will maintain or enhance the existing character, protect important views and, provide attractive new buildings, places and spaces. Some recent three and four storey developments have shown that the setting of the town and streets and spaces are all too easily damaged by buildings of an inappropriate form and scale and that key views are easily lost. The excitement of Bradford on Avon is its position, with the hill rising steeply to the north, houses appearing on top of houses and steps connecting the streets, a unique quality that we owe to future generations to maintain.

The character and quality of neighbourhoods around the town and in the rural area is varied covering differing ages and styles of architecture. Proposals for development need to be designed accordingly. Sound conservation practice and good design should apply throughout the plan area.



Abbey Mill

Church Street

HOUSING FOR ALL

Introduction

The existing housing stock in the Bradford on Avon Neighbourhood Plan area is varied and includes houses and flats in the historic core, post war and later 20th century housing estates surrounding the town, and recent redevelopment and infill within the settlement boundary. There is also a limited range of housing in the Green Belt. The popularity of the town as a place to live brings with it an increase in the cost of housing, which is now amongst the highest in Wiltshire.

To inform the Neighbourhood Plan the Town Council commissioned a Housing Needs Assessment, the findings of which have influenced the policies in this plan. Younger residents generally seek additional space and some older residents the opportunity to move to smaller but centrally located dwellings. A summary of the findings of the Survey is attached as appendix 2. In the provision of new housing attention needs to be given to the needs of all sections of the community including “lifetime” homes and homes for those with disabilities.

OBJECTIVE 2 - to provide for limited growth in the plan period to 2026 in accordance with the Wiltshire Core Strategy; and to provide for demonstrable local needs in sustainable locations to maintain a balanced community; all in accordance with the findings of the 2014 Housing Needs Survey.

POLICY H1 - Proposals for infill development will be supported where they make a positive contribution to the town and are in keeping with their surroundings. Proposals for development within existing residential curtilages will be required to:

- compliment the scale and development pattern of the locality in which they are sited
- demonstrate that vehicular access and parking are adequate, safe and convenient
- provide private amenity space for existing and new dwellings
- not adversely affect the amenity of neighbouring properties
- ensure that adequate garden space to existing dwellings is retained in relation to setting and amenity

Bradford on Avon has accommodated a significant amount of infill in recent years, mostly on previous employment sites. There is a need to maintain an appropriate balance between buildings and open space (including gardens) and to protect the distinctive characteristics of all parts of the plan area. Because virtually all of the larger sites within the settlement boundary have been re developed the potential for future infill is limited. It is however accepted that some windfall sites are likely to come forward, including the sub-division of larger houses, or the replacement of larger houses with smaller units.

POLICY H2 - Within the town centre, residential uses above shops requiring planning permission will be supported where:

- the living accommodation will have a satisfactory level of access and amenity
- it will not add to existing on-street parking in congested areas
- on-site and screened provision is made for waste bins

Community Action

The Town Council strongly recommends that developers take full account of Building for Life 12, or subsequent versions thereof, and will seek to encourage the use of this guidance document, to help enhance the positive benefits of new development.



Housing alongside the canal

Early post-war housing New Road

ECONOMY AND ENTERPRISE

Introduction

In the 25 years since the closure of the Avon Rubber works, the introduction of housing on former employment sites has upset the balance, leading to significant out-commuting and fragile daytime and evening economies. The challenge is to redress the imbalance between living and working, to ensure that employment and commercial activity are retained and improved, reduce the proportion of residents forced to out-commute, and to stimulate a more sustainable town for the long-term.

The range of shops and services available in the town is not adequate to serve the needs of the town and as a result, many residents focus their spend elsewhere and the town centre suffers acutely from low footfall. A 2013 benchmarking survey reported a vacancy rate of 11% compared to 7% in south west small towns.

On the plus side, the town's retail offer is based on independent retail; this is its appeal and marks it apart from other nearby "clone towns" which feature many of the same multiple chains. The food economy is growing with the continued success of existing restaurants and coffee shops, new additions to the trade, and more to come. The town is also developing a niche in the wedding industry with a number of leading bridal boutiques locating here.

The existing employment sites at Treenwood and Elms Cross are fully developed and provide a range of business uses. In addition, the 1.05ha commercial part of the Kingston Farm development - focused in large part on the new multi-million pound purpose-built factory for Anthony Best Dynamics - will deliver dozens of new jobs for the town.

However the availability of small workshop space for technology and manufacturing remains very limited in the town.

There are unused or underused employment and agricultural sites in the plan area with potential for improved use and these could contribute some of the additional employment space required in the WCS.

OBJECTIVE 3 - to stimulate, secure and protect economic activity in Bradford on Avon through a process of retaining existing employment sites and providing new opportunities. Also to encourage appropriate commercial activity in the town centre to support the day and evening economy and to encourage the diversification of rural businesses including the use of redundant rural buildings for alternative employment uses.

POLICY E1 - Sustainable business and employment development within or adjacent to Bradford on Avon will be supported.

POLICY E2 - Proposals for the development of recreational, cultural, arts and tourist facilities within the town will be supported, provided that the scale, siting and design of such developments conserve the natural and historic environment and make a positive contribution to the locality in which they are sited.

An annual programme of events is being developed, including walking and cycling festivals, arts and fringe festivals, and the promotion of local niche sectors such as food and drink. The historic town centre, its attractions and accommodation providers are marketed by the Tourist Information Centre to a growing number of visitors.

Community Action

The Town Council will seek to work with others to encourage masterplanned development in Areas of Opportunity identified in Chapter 4 of this Plan.

Bradford on Avon Town Council will lead the masterplanning process and will aim to bring together the landowners in a joint exercise.

Reasons for these policies

These policies are needed to encourage the provision of additional employment space and opportunities for working within the plan area and to minimise the continued loss of employment land to housing. The town centre needs to provide as far as possible for local needs, including recreation, and enhanced attraction for visitors. Reuse of unused or underused employment sites within the plan area needs to be encouraged.

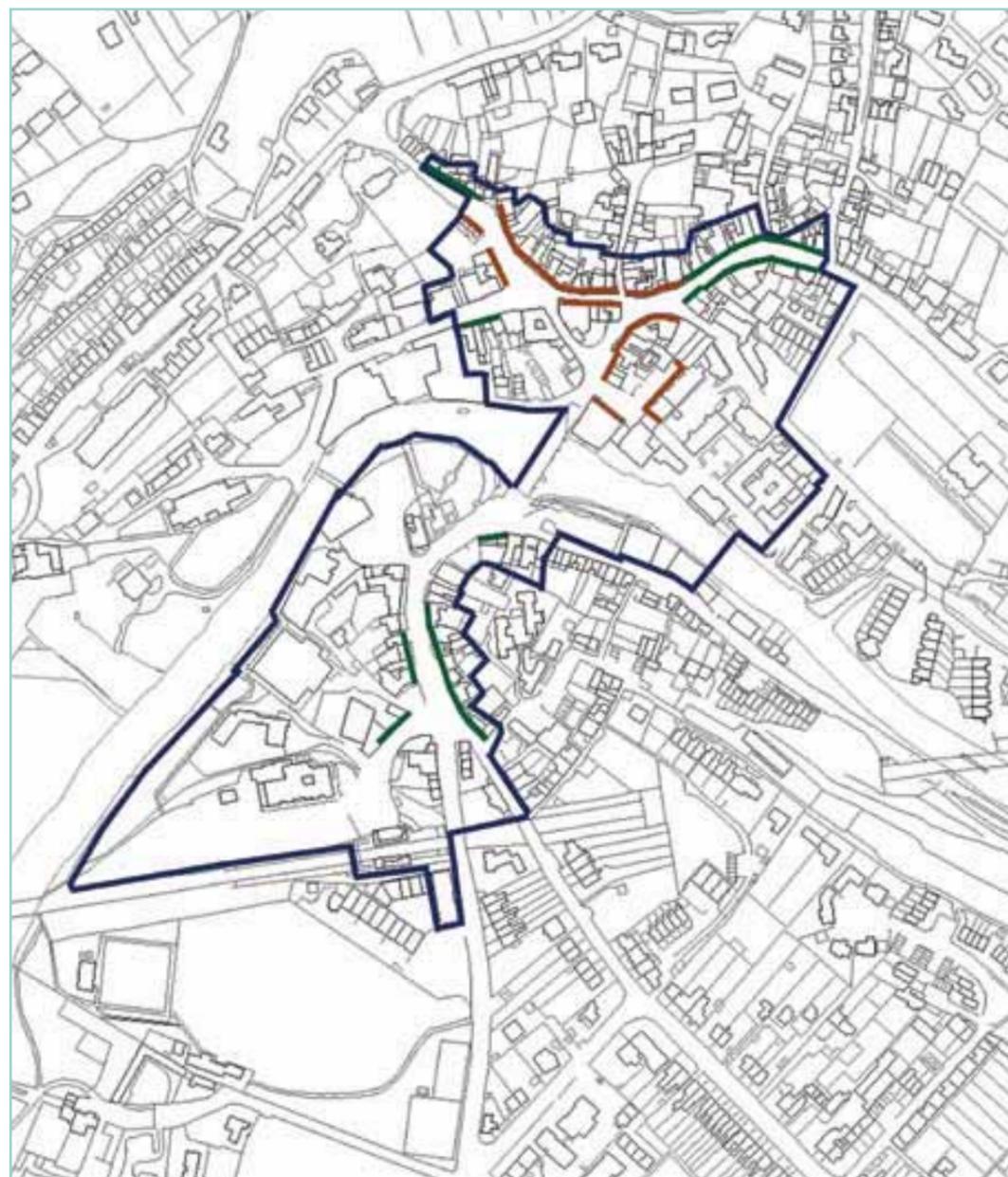
In 2014, the Town Council commissioned Cobweb Consulting to produce a Business Needs Survey as part of the evidence base. Their findings were published in January 2015 (see Appendix 3). Based on a response from 170 businesses, the survey finds "there are likely to be 57 enterprises looking for premises in Bradford. As the survey covered a sample of local business rather than all, this should be viewed as a minimum figure". This does not, of course, take account of people moving to the town to set up new businesses or bring their existing businesses - in particular those moving to the town and working from home. The Survey goes on to stress that "support by the Town Council for new business creation would be instrumental in maximising such opportunities as do exist".

The 2011 census emphasises the degree to which those living in Bradford on Avon are involved in higher added value jobs. The challenge is to ensure that a growing proportion, including the younger generation, should be able to find employment in the town, instead of commuting to key areas of employment including Bath, Bristol, Swindon and Trowbridge.



The new riverside

Lamb Yard



Map 3: Retail Frontages

- Town Centre Boundary
- Primary Retail Frontages
- Secondary Retail Frontages

GREEN SPACES AND BIODIVERSITY

Introduction

Green spaces both public and private, including gardens, play an important role in giving Bradford on Avon its particular character, amenity, and biodiversity value. The links between the natural and built environments are especially important because of the way in which the town has developed but there are areas in need of improvement. The town benefits from green corridors passing through and providing important habitat and a range of other green functions, including recreation and flood control. Outside of the built up area, the surrounding farmland also provides valuable green corridors for protected species of bats commuting between different parts of the Bath and Bradford on Avon Special Area of Conservation (SAC).

OBJECTIVE 4 - to ensure the recognition of the importance of green spaces and landscape features to the character, heritage and biodiversity of the town and its setting and to ensure that such features are conserved and enhanced and not lost or damaged through inappropriate development. Also to protect and enhance the Town's green corridors, including the river and canal corridors and the open countryside that together form the landscape setting to the town.

Community Action

The following are important features of the Neighbourhood Area and the Town Council will seek to encourage developers to take them into account:

- views through and across the local and wider landscape and townscape, across roofs, between buildings and from public and private paths
- substantial natural drystone walls with cock-and-hen copings and stone gateposts lining streets and lanes
- traditional agricultural buildings
- river and canal corridors with associated bankside vegetation and often tree cover beyond
- wooded slopes and copses
- trees including garden trees, hedgerow trees, parkland trees, and traditional orchards
- native hedges and spring fed ponds in the wider landscape
- open and undeveloped rural skylines outside the town, and skylines dominated by historic buildings within the Conservation Area
- generally open arable landscapes on higher ground to the west and north and areas of pastoral landscape to the west, south and east
- tranquil green spaces within the fabric of the town, where the sound of bird song predominates, and nights are quiet and with dark skies

POLICY GS1 - The Neighbourhood Plan strongly supports the enhancement of Bradford on Avon's biodiversity. Development will be expected to provide net gains in biodiversity where possible.

The NPPF requires development to achieve a net gain for biodiversity where possible. Bradford contains a variety of nationally and locally important wildlife sites and species, including the Cotswolds AONB, Gripwood Quarry SSSI, four Wiltshire County Wildlife Sites (Belcombe Court Wood, Lowland Calcareous Grassland north of Belcombe Road surrounding Electricity Sub Station; River Avon; and the Kennet and Avon Canal), plus a range NERC Priority Habitats including 12 traditional orchards. The town's open farmland with pasture and hedges are used by bats such as greater and lesser horseshoes and Bechstein's bat for foraging and commuting and the town lies within a Consultation Zone for bats in relation to the nearby Bath and Bradford on Avon Special Area of Conservation (SAC). All developments must take account of Wiltshire Council's HRA Guidance on the Bath and Bradford on Avon Bats Special Area of Conservation to ensure no loss of site integrity.

POLICY GS2 – Development within the Neighbourhood Area that affects known or potential bat habitats should be accompanied by a bat survey. Where found necessary appropriate mitigation will need to be provided, having regard to the Wiltshire Council Habitats Regulations Guidance Document.

The Neighbourhood Plan area lies within the Consultation Zone associated with the European designated Bath and Bradford on Avon Special Area of Conservation and provides supporting habitat for a wide range of bats including those protected under Annex II of the Habitats Regulations. Habitat includes buildings both historic and modern, as well as natural features such as trees, cliffs and caves for roosting and breeding, and water bodies, water courses, woodland, trees, hedges and open fields for foraging and commuting. Mitigation may include the retention, protection, restoration and management of open areas and other habitats and the design or modification of buildings to accommodate bats. Given that bats are affected by light pollution, the design of lighting schemes will also be important. All developments must take account of Wiltshire Council’s HRA Guidance on the Bath and Bradford on Avon Bats Special Area of Conservation to ensure no loss of site integrity.

POLICY GS3 - The sites listed below and shown on the accompanying plan are designated as Local Green Space, where development is ruled out other than in exceptional circumstances.

- 1 Victory Fields and Culver Close Recreation Ground
- 2 Poulton Field including Fitzmaurice School Field
- 3 The Strips
- 4 Priory Close green
- 5 The field to the east of Crown Court
- 6 The open area with large mature trees to the south west of the junction of New Road and Springfield
- 7 Bearfield



Open space at Springfield



Woolley Conservation Area



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Map 4: Local Green Spaces

POLICY GS4 - The following will be supported:

- **enhanced access to green space, allotments and the countryside;**
- **the protection and improvement of existing public rights of way, especially where this provides for mobility impaired people;**
- **the provision of new public rights of way and/or permissive routes;**
- **enhancement of biodiversity, landscape character and the recreational value of open spaces in the town**

Reasons for these policies

Green spaces, landscapes, landscape features and views in Bradford on Avon have an especially distinctive character and make an important contribution to the visual and physical quality of the town and its setting. They are valuable in providing recreation and amenity space and, where properly managed, protect and enhance biodiversity. Easy access to green and open spaces contributes to sustainable development and healthy living. New development or changes of use will therefore where appropriate be expected to contribute to improved green space provision and also to improved access including the creation of circular routes.

COMMUNITY WELLBEING

Introduction

Bradford on Avon is a vibrant town with an extensive range of social, cultural, spiritual, health and sporting organisations with associated facilities. This wide mix contributes substantially to the wellbeing of the town and provides a focus for the community. The diversity of the organisations is important in ensuring that something is provided for everyone; however, the sustainability of some facilities is marginal due to the age or relative inadequacy of the facilities. Good use is made of the canal and river.

The town has a range of sporting facilities in walkable locations with a focus just to the south of the town centre at Culver Close and Victory Field and at Poulton. These are important open spaces in their own right that provide for a multitude of formal and informal sports and recreation activity. Space for outdoor sport, particularly pitches, does not meet present day demands. Facilities at the former Avon Club site in Trowbridge Road, currently used by Bradford on Avon Football Club and for bowls and archery are inadequate and outdated.

The town has a wide range of sporting facilities in walkable locations with a focus just to the south of the town centre at Culver Close and Victory Field and at Poulton and the Trowbridge Road Football Club site. These are important open spaces in their own right which provide for a multitude of formal and informal sports and recreation activity.

The town's health and social care facilities and services are generally at capacity for the current population and improvement of these services will not be possible without developing new or expanding existing facilities.

A full list of indoor and outdoor facilities within the plan area is included below. These are essentially for local use, although the Wiltshire Music Centre has a wide attraction outside Bradford on Avon.

OBJECTIVE 5 - To protect and enhance those existing community facilities and services that are considered important in maintaining a vibrant and active town for the benefit of local people and visitors. Also to support the development of new facilities including those for integrated health and social care, the elderly, the disabled, children and young people.



Enjoying the river

The Music Centre

POLICY C1 - Proposals that would result in the loss of any of the community facilities listed in the table below will not be supported unless:

- it can be demonstrated following public consultation that the facilities are no longer needed or viable (guidance is provided in Appendix 6 in this regard)
- that suitable alternative provision exists in the immediate locality, or
- suitable alternative provision is made in the development proposal

POLICY C2 - Proposals for new or improved community facilities will be supported provided that:

- the proposal would not harm the character or amenity of the local environment or compromise development inappropriate to the Green Belt
- the proposal is well located for the population it serves without the need to drive and would not have an unacceptable impact on the local road network
- the proposal would not have significant harmful impacts on the amenities of surrounding residents

WCS Policy 49 outlines the need to protect community facilities and the above policies provide the local context. Many existing sport and recreation spaces are in central locations and well related to the populations they serve. Reducing the need to drive is central to the objectives in the plan.

Particular attention should be given to the provision of additional outdoor sport and recreation spaces. This need was identified in the West Wiltshire Leisure & Recreation Development Plan Document dated January 2009 and it has yet to be addressed. Proposals for such facilities will be supported where these are in accordance with plan objectives.

Community Action

The Town Council supports the creation of a Campus of Public Services in the town centre and will seek to work with third parties in order to achieve this.

POLICY C3 - The provision of new allotments to meet local needs will be supported.

Reasons for these policies

Bradford on Avon has a wide range of community facilities in good walkable locations but some of these are long established and showing the effects of their age. Others such as allotments are oversubscribed. Community facilities make a major contribution to the health and wellbeing of society and the quality of life in the town. Consequently, protection and enhancement of these facilities and, where desirable, the creation of new facilities are encouraged by these policies.

Wiltshire Council remains committed to the idea of a campus of public services in or near the town centre and the Community Operations Board is investigating how services can be realigned and improved. A feasibility study is proposed and this will take into account, and work within, the framework of the Neighbourhood Plan.

List of Community Facilities

Meeting Places

Air Cadets
 Avon Social Club
 Bearfield Church
 Catholic Church
 Christ Church
 Guide Headquarters
 Holy Trinity Church
 Lambert Rooms
 Mount Pleasant Club
 Mount Pleasant Centre
 Old Baptist Chapel
 Priory Barn
 Quaker Meeting House
 St Margaret's Hall
 St Mary Tory Chapel
 Saxon Church
 Scout Hut
 Tithe Barn
 Town Club (Market Street)
 Masonic Hall
 United Church
 Youth Centre
 West Barn
 Wiltshire Music Centre
 Zion Church

Recreation / Open Spaces

Ashley Road Play Area
 All Allotments
 Barton Farm Country Park
 Barton Farm including The
 Community Orchard
 Play Area
 Culver Close including The Bowling
 Club
 Poulton Field / Skateboard ramps
 - Tennis Courts and Netball
 Festival Gardens
 Golf Course
 Greenland View Play area
 Mythern Meadow Play Area
 Poulton QE2 Field
 Rowing and Canoe Club
 Sailing Club
 Sladesbrook Play Area
 The Strips
 Swimming Pool
 Trowbridge Road Football Club site
 - including the Bowling Green and
 Archery
 Victory Field including Basketball
 Westbury Gardens

Services

Cemetery
 Children's Centre including Nursery
 Fire Station
 Health Centre Station Approach
 The Hub
 St Margaret's Surgery Bridge Street
 Library and Museum
 Police Station
 Railway Station

TRAFFIC AND TRANSPORT

Introduction

Bradford on Avon suffers from the effects of vehicular traffic. This problem is intensified by the narrow streets and narrow pavements in much of the town, with traffic liable to intimidate pedestrians, and aggravated by the single bridge crossing of the river. It is also evident in the visual intrusion and congestion of on-street parking, much of which is under considerable pressure. Vehicular traffic contributes to noise and air pollution, which adversely affects the use of buildings along the major traffic routes. Street clutter, including road signs, is a blight.

Within the built-up area of Bradford on Avon there is an extensive network of footpaths, including alongside the river and the canal and steps up the hillsides. Provision for cyclists is limited, primarily because of the narrow historic streets, sometimes with steep gradients.

The town benefits from an effective train service, the use of which is increasing, although pedestrian access to the station could be improved. Bus services link Bradford on Avon to surrounding towns and villages and there is a local bus serving the urban area.

OBJECTIVE 6 - to improve the pedestrian environment in the town, encouraging people to walk or cycle rather than use their cars thereby assisting in the improvement of the overall environment and air quality. Also to ensure that future developments are located where they can easily be accessed by pedestrians, cyclists and public transport, including where possible extending the footpath and cycle route systems.

POLICY T1 - Enhancement and/or extension of the public rights of way network, especially provision for cyclists, will be supported.

POLICY T2 - Development proposals that would result in the loss of public or private parking capacity will not be supported unless they can show that alternative capacity will be provided elsewhere or can show that the proposals will result in a reduction in the need for off-street parking.

Reasons for these policies

Studies and consultations over many years have shown that the volume of traffic in Bradford on Avon, and the intimidation of pedestrians and atmospheric pollution that come with it, are major local concerns. Policies in this Plan aim to discourage unnecessary traffic, to mitigate the impact of traffic generally and to make the town's roads and public realm generally more pleasant for pedestrians and cyclists and thereby make walking and cycling more attractive options. The town's steep hills, narrow roads and historic buildings and the river all make it difficult to do much more.

Parking is a difficult issue. Provision of more parking could be said simply to encourage people to drive. But we have to be realistic. Many people need to drive to get to work or to do their shopping. Encouraging use of electric and other 'green' forms of vehicle, while beneficial in many ways, will not reduce the need for somewhere to park the vehicles. Provision of sufficient parking in the right places helps to avoid unnecessary driving around looking for somewhere to park. It is also important to the town's well-being that people wishing to work or shop here are not deterred from doing so by a lack of suitable parking. One problem is that most of the town's shops are north of the river and most of its parking is south of the river.

In parallel with preparation of this Plan, the Bradford on Avon Air Quality Alliance (AQA) is examining possibilities for tackling pollution caused by vehicle exhausts with the aim of improving the town's air quality. The AQA's work includes further analysis of data from the 2013 traffic survey, of possibilities for tackling the shortage of car parking, and of developing home deliveries from shops and of walking trains to and from schools.



Bradford on Avon Station

St Margaret's Street

4 - AREAS OF OPPORTUNITY

CLIMATE CHANGE

The effects of climate change need to be continually assessed in relation to a wide range of activities and developments, many of which are interrelated. Policies in the plan have been drafted to take into account the need to mitigate the detrimental effects of climate change and to secure improved use of resources. In recent times the town has been affected by flooding and there is a need to ensure that any changes in the plan area do not aggravate the situation.

The plan aims to rebalance the town and increase job opportunities and thereby reduce the need to travel. Enhancing the pedestrian and cycling environment is to encourage people away from car use. Improved energy efficiency in historic buildings is encouraged and guidance is provided. The retention of higher-grade agricultural land for local food production is important and should contribute to reducing food miles. All such measures can contribute to reducing omissions and improving air quality.

The Town Council will seek to encourage changes that seek to reduce flood risk to the town, which may include, in the longer term, 'pulling back' inappropriate development from the river corridor / floodplain. The Town Council will seek to encourage the delivery of sustainable drainage systems (SUDS) through the planning process and will encourage the retrofitting of SUDS where practical.



Barton Farm Country Park



New houses with solar roofs

Areas of opportunity are those within the town where enhancement or development in the public interest can be shown to make a positive contribution to the future. The station car park and St Margaret's Hall car park have been identified as areas worthy of further study. At its Trowbridge Road Ground the Football Club has identified the need to improve its playing areas and upgrade or replace the buildings of the former Avon Club.

In response to the informal consultation on the Neighbourhood Plan Policies, objectives have been identified that proved an appropriate level of certainty as to the nature of proposals likely to come forward in each of these areas.

The Station Car Park and surrounding area

Dominated by moving and parked vehicles and poor pedestrian access the station car park is probably the least attractive place within the Neighbourhood Plan area and is a lost opportunity. The area shown has been identified for a detailed planning study in the form of a development brief and masterplan so that changes can be co-ordinated and designed to enhance and benefit the town. This is especially important because the car park and station are often seen as the gateway to Bradford on Avon and the impression given on arrival needs to be improved.

Objectives:

- make improved use of the area for non-residential purposes, although some limited non-market extra-care or social housing may help to improve deliverability of the overall scheme
- enhance the setting of, and access to, the Railway Station and maintain space for taxis
- improve the layout and appearance and capacity of the car park
- facilitate improvements to the Health Centre
- improve access to the river walk
- maintain views to the hillside terraces, particularly from the station
- investigate additional uses that can add to the attractions of the town
- retain the green character and biodiversity of the river corridor

The masterplanning process will be led by the Town Council working in conjunction with land and property owners in the defined area.

St Margaret's Hall Car Park

Although this is a relatively small area it is in the heart of the town and currently its most interesting feature is the view to the hillside terraces. There is considerable potential for enhancement and a start has been made by the sensitive renovation of the former Riverside Inn to create Timbrell's Yard. Pedestrian movement from St Margaret's Street to the McKeever Bridge is not well defined and proposals to improve pedestrian safety and amenity will be investigated.

Objectives:

- improve pedestrian access from St Margaret's Street to the McKeever Bridge and to the riverside
- improve links between the car park and Westbury Gardens
- enhance the setting of St Margaret's Hall
- investigate whether an improved car park layout can be achieved

Bradford on Avon Football Club site Trowbridge Road

The site currently used by the Bradford on Avon Football Club, the Bowls Club and others, was formerly the Spencer Moulton sports ground and the Avon Club. The existing buildings and hardstandings are sub-standard, in poor condition and, in part, disused. The pitches and bowling green are still in use and the site contributes to a sense of openness in the locality. The Trowbridge Road site is currently held by Fields in Trust, which is a national charity formerly known as the National Playing Fields Association. The purpose of the Trust is to ensure that everyone has access

to free local outdoor space for sport, play and recreation. In principle, the Trust can agree to a land transfer provided that the access to outdoor space is maintained to an equivalent or enhanced level.

In relation to this area of opportunity the Town Council will look to support:

- Relocation of some or all of the sporting activities currently on the site to a new location, or locations, where enhanced facilities can be achieved and the provision of an enabling mixed-use development on the Trowbridge Road site where this is in accordance with the principal objectives and relevant policies of the Neighbourhood Plan

or

- On-site improvements at Trowbridge Road to achieve
- retained open space for sport and recreation
- improvements to the existing buildings to enhance their value to the community
- improved use of the area for the local community and the town as a whole
- additional tree planting to improve the landscape setting, amenity and biodiversity
- retention of the open aspect to Trowbridge Road and Poulton Lane
- an investigation of the possibility of public car-parking when the sports facilities are not in use
- an examination of opportunities to obtain funding for community projects or by providing enabling development on part of the site

or a combination of these two.

The need to provide much improved facilities for sport and recreation and satisfy the requirement for additional football pitches has been identified during the plan-making process. The provision of improved facilities within the plan area would not only benefit the community, it would also be in accordance with the sustainability objective of making the town more self-contained and reduce the need to travel elsewhere.

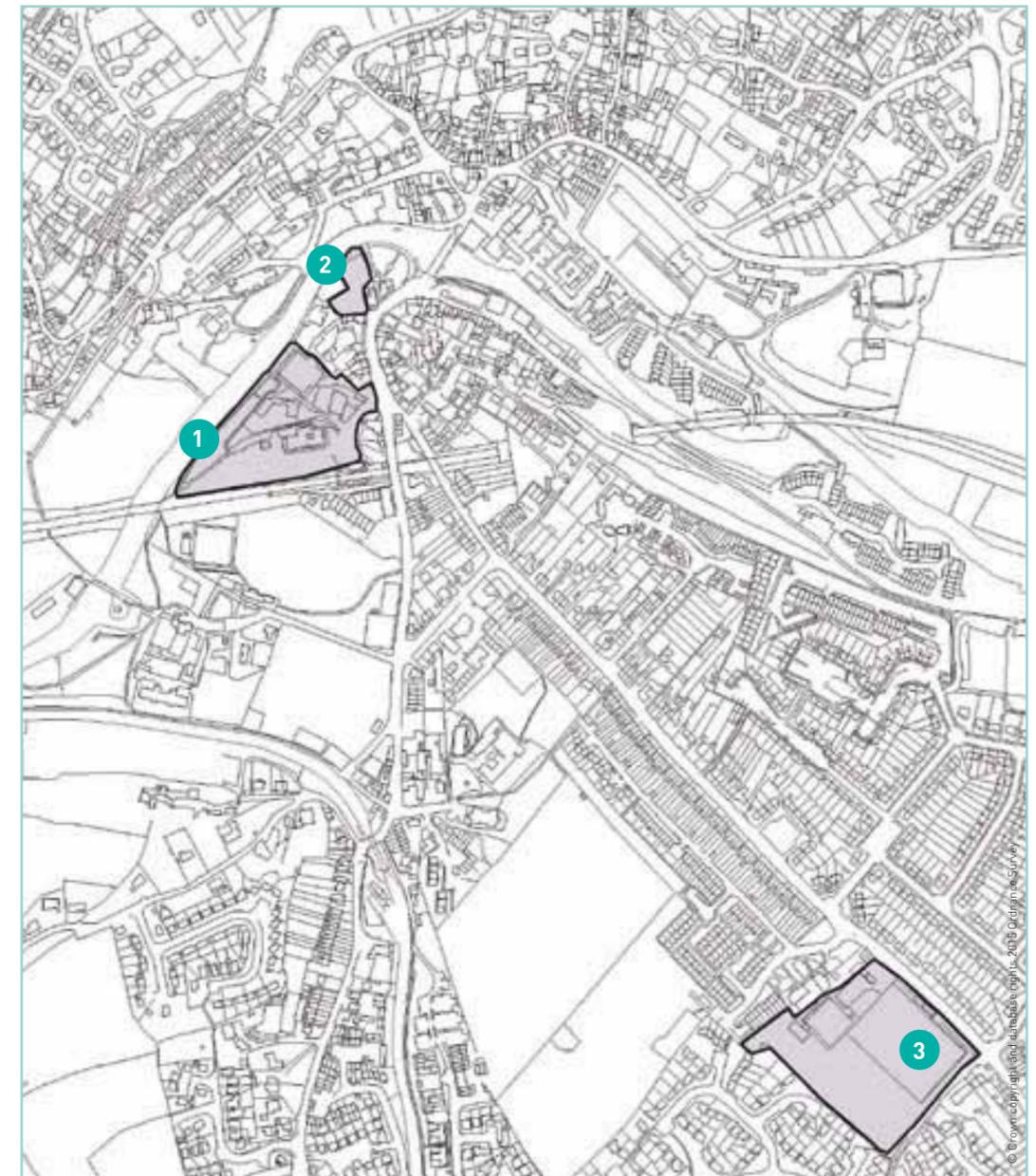
Current investigations by Bradford on Avon Football Club are focused on an idea to combine with other sporting clubs and activities to create a Sports Hub elsewhere in the town, possibly on the southern edge of the town at the Beehive Field. Development in this location would be within the Green Belt and would need to be assessed in relation to the Green Belt policies of the NPPF and the WCS. National and local planning policies can in principle allow for such a development to take place, subject to detail. The NPPF, WCS, and NP policies C1 and C2 and appendix 6, provide further guidance on how such a scheme could be achieved.



Station Car Park



St Margaret's Hall Car Park



Map 5: Areas of Opportunity

- 1 Station Car Park
- 2 St Margaret's Hall Car Park
- 3 Trowbridge Road Sports Club

5 - HOW THE NEIGHBOURHOOD PLAN WILL BE IMPLEMENTED

The Town Council will seek to monitor the impact of the Policy of the Neighbourhood Plan to determine its effectiveness.

The Community Infrastructure Levy (CIL) that was introduced by the Planning Act 2008 is a tool for local authorities to help deliver infrastructure to support development of their area. The Levy is based on types of development and floorspace. Where there is an adopted Neighbourhood Plan, 25% of the Levy is passed to the relevant Town or Parish Council. Bradford on Avon Town Council has determined that CIL priorities are:

- Works to improve pedestrian safety and enhance pedestrian spaces / facilities
- Action to improve air quality in the AQMA
- New footway links
- Enhancement of community facilities
- Enhancement of Green Spaces and play areas

The future of Bradford on Avon will depend on good decision-making covering all those aspects of change that affect the quality of life for residents, businesses and visitors to the town. This plan is intended to provide the detailed guidance and policies needed to achieve the vision.

APPENDICES

List of Appendices

- 1 Flood prevention
- 2 Summary of the Housing Needs Assessment
- 3 Summary of the Business Needs Assessment
- 4 Assessment of the viability of Community Facilities
- 5 Green spaces for improvement
- 6 Explanation of terms

Appendix 1 - Flood Risk Analysis

The National Planning Policy Framework (NPPF) utilises a sequential risk-based approach which aims to steer new development to areas at the lowest risk of flooding and to avoid inappropriate development in areas at risk of flooding. Whilst this deals with the situation regarding new development, the problem of existing development at risk of flooding remains. In this context the Environment Agency is required to assess how the potential for flood damage can be minimised.

In June 2012 the Environment Agency published the Bristol Avon Catchment Flood Management Plan (CFMP) which includes a section on Bradford on Avon as follows:

The Summary Report of this document was published by the EA in 2012 to understand the scale and extent of flooding now and in the future and set policies for managing flood risk within the catchment. CFMPs should be used to inform planning and decision-making by key stakeholders. The site lies within Bradford on Avon and Frome sub-area and issues associated with the area as identified by the EA are as follows:

'This sub-area covers the towns of Bradford on Avon and Frome. Both towns would be cut in half if major flooding takes place. Unlike Bradford on Avon, Frome already has some protection afforded by an earlier scheme. Both towns suffer from the impracticality of future improvements to channels and bridges in the town. There are currently 75 properties within the current 1% annual probability flood extent and this is expected to rise to around 190 in the future.

Three Scheduled Monuments in Bradford on Avon are at risk of flooding. Also at risk in the town are an electricity sub-station, a fire station and a police station. The A363 road and the railway line through the town are also at risk.'

The CFMP preferred policy for Bradford on Avon is Policy Option 3, which applies for areas of low to moderate flood risk, where risk is not expected to increase significantly in the future and it is currently appropriately managed.

The proposed actions to implement the preferred policy are described below.

- Reinforcing contingency planning and self-help, increase awareness of risk and response to flood warnings and discourage inappropriate development
- Through the development of the System Asset Management Plan, study the cost-efficiency of existing maintenance of the town centre's bridges, channels and culverts and implement any recommended improvements

The CFMP indicates that there is unlikely to be any major new flood defence scheme constructed in Bradford on Avon in the foreseeable future. This indicates that Wiltshire Council will ensure that new development proposals do not increase the flood risk to the surrounding area and are designed accordingly.

Whilst the CFMP remains a 'live' document, more recently the Environment Agency has published Flood Risk Management Plans (FRMPs). The relevant FRMP for Bradford on Avon is the 'Severn River Basin District Flood Risk Management Plan 2015-2021'. The plan is available to view at: <https://www.gov.uk/government/publications/severn-river-basin-district-flood-risk-management-plan>

For Bradford on Avon, the Flood Risk Management Plan states the following in the period 2015 – 2021:

“Review existing modelling and assess options for potential scheme.”

The Agency is currently working in partnership with Wiltshire Council and the Town Council to appraise the flood risk in the town, in the area around the Town Bridge. This is to allow it to investigate whether there may be viable options for a scheme to reduce the risk of flooding in the community. The Agency will continue to work with stakeholders to seek options, subject to business case approval, for a possible future flood alleviation scheme.

Current information regarding the areas liable to flood is available on the Environment Agency website environment-agency.gov.uk.

Appendix 2 - Summary of Housing Needs Assessment

As part of preparations for developing a Neighbourhood Plan Bradford on Avon Town Council commissioned a postal housing needs survey. Responses were received from 1,077 households – nearly a quarter of those in the town. The results of the survey were interpreted in the context of housing market drivers (prices, rents, incomes, assets, affordability, supply) to derive an estimate of future affordable and market housing requirements.

Summary of survey results - as supplied by Cobweb Consulting

Demographics

Slightly more women than men responded (55% to 45%). Half the sample was of working age, but there was a bias towards older residents when compared to Census data. 41% households were couples without children, the largest single group. At least 18% households have children (26% in the Census). Average household size was 2.1 people.

Property and tenure profile

Over half had lived in their properties for over 10 years, and only 14% had been in their homes for under 2 years. 87% were owners (60% owned outright); 7% rented from social landlords and 5% from private landlords. 9% have had adaptations made to their properties, and 10% think they will need some in the next ten years.

Views on housing supply

77% think local housing supply is inadequate, especially affordable homes for young people (44%). 44% supported a small development for local people, with 37% saying 'perhaps'. Only 16% were firmly against, though there was concern about infrastructure and traffic.

Future demand for housing in Bradford

From the survey, there was demand from 285 households over the next five years: 158 wishing to move within Bradford, 37 newly forming households wishing to stay in Bradford, and 90 households with local connections currently living outside Bradford but wishing to move in. Note that these figures only represent the 23% of those who responded to the survey. On the assumption that most people wanting to move would have responded, figures have not been grossed up to reflect the full population.

Nature of future demand

25% of the 285 households were single adults, 33% were couples with no children, and 36% (at least) were households with children. 20% aspired to a one-bedroom home, 36% to a two-bed, 30% to a three-bed, and 14% to a four-bed or larger. 80% would prefer an owner-occupied home as their next residence, though only 64% expected this to be the case. Around 13% both preferred and expected to be social renters. 2% wanted their next home to be private rented, but 17% expected that this would be the case.

Need for specialist accommodation

Sixteen households were looking for sheltered or retirement property, and a further four were seeking supported accommodation, because of health reasons, or to obtain more care and support. Half would be looking outside Bradford for this.

Respondents' views on affordability

Just over half said they could afford to buy a property priced £250,000 or lower. More than half could not pay a rent of over £600 per month. Over half of potential movers earned less than £38,400 per annum, but over one in four earn over £52,800. Those expecting to buy outright had the highest levels of savings; those expecting to rent most likely had no savings; those expecting to buy with a mortgage were included in all categories, including those with debts.

Testing affordability against market data

While expressed interest and aspiration for a tenure is a relevant factor, it needs to be tested against the ability of households to afford accommodation currently on the market. This was done by examining sales prices, private rents, cost of Shared Ownership properties, incomes, savings and equity, and employment status. In summary we concluded that of the 285 households:

- 57% (access the private rented sector, assuming lettings are available)
- 13% (37) would be reliant on social affordable rented housing were they to move'

Conclusions

- Affordability is a key issue in Bradford on Avon. While substantial numbers of potential movers will be able to afford property on the open market, a significant section is likely to find this impossible, or would have difficulty doing so.
- While strongest demand is for two and three bedroom properties, a significant number are seeking one-beds (20%), and over half potential movers are single people or couples without children. There is thus some degree of potential self-balancing in the market.
- We do not consider that there is a requirement to intervene in the market place to assist the 57% of potential open-market buyers meet their needs. Property sales and transaction numbers appear to have fully-recovered from the 2008 downturn.
- There is scope for a Shared Ownership scheme to be developed, either free-standing or integrated into other affordable rented and / or market housing schemes. There is current identified need for 33 Shared Ownership units.
- The private rented sector plays and is likely to continue to play an important role in meeting the housing needs of those who cannot afford owner-occupation and are unlikely to access social affordable rented housing.
- We estimate that there is a requirement for affordable social rented homes. Taking account of the likely flow of re-lets and new lettings to new tenants, we estimate that there is a current deficit of ten units. When we build in an allowance for meeting the needs of the potential Shared Owners over the planning period, this results in a current requirement of:
 - 10 affordable rented homes (45%)
 - 3 Shared Ownership homes (14%)
 - 9 open-market homes (41%).
- Based on the demographics of those needing affordable rented homes, the size split of the ten homes would be:
 - 4 one-bedroom homes
 - 5 two-bedroom homes
 - 1 three bedroom home.
- Similarly for the Shared Ownership scheme we suggest:
 - 1 two-bedroom home
 - 2 three-bedroom homes.
- We also suggest that further consideration be given to the standards of new dwellings in relation to meeting the need for specialist older peoples' and supported housing.
- While we have not quantified the number of affordable housing units needed in future years, it seems clear that the affordable housing needed is unlikely to be met by the development of the remaining housing to be provided under Wiltshire Core Strategy requirements over the plan period to 2026.
- There is substantial support within the Bradford on Avon community for the development of small affordable housing schemes.

Cobweb Consulting, 2 Kemerton Road, London, SE5 9AP
January 2015

Appendix 3 - Summary of the Business Needs Assessment

The Business survey produced 170 responses; 147 from existing businesses and 23 from people expecting to start a new enterprise in Bradford on Avon. The key findings as supplied by Cobweb Consulting are these:

Existing businesses

- The majority of businesses (60%) have been established for more than ten years but 16% having been established within the previous two years suggests a good rate of business creation.
- Tourism, leisure and entertainment and consultancy were the most frequently found sectors, followed by retail and IT and Communication.
- Almost half (49%) of these enterprises are home based with the remainder fairly evenly split between owned and rented property.
- By far the most important reason for locating their business in Bradford was that it was also where they lived, supported by their appreciation of the quality of life in the area.
- Within the next five years, 12% of existing businesses expect to need new premises and a further 27% think this is possible. The majority will look for these premises within Bradford.
- In addition, 30% of those who currently work from home will or may need to move into premises in the same time frame.
- The most likely requirement is for small premises, less than 250 sq. ft. Interest was expressed in serviced office premises by 12% of existing businesses.

New business creation

- Amongst the 23 potential new businesses the most frequently mentioned were creative fields such as photography but there seem a good variety of new business ideas to contribute to the local economy.
- One of the main reasons for starting their business in Bradford was because they already lived there but they had also taken into consideration factors such as local networks and suppliers and transport links.
- Nine of these new enterprises would be looking for premises with the most likely timing one to two years time. The remainder would work from home.

Future demand for premises

- Taking into account demand from both existing and new businesses, over the next five years there are likely to be 57 enterprises looking for premises in Bradford. As the survey covered a sample of local business rather than all, this should be viewed as a minimum figure.
- Much of the requirement is for small spaces (more than 50% of those who know the size they will want) but larger premises will be needed too.
- There is also a good level of interest (31 people) in serviced office premises or small start up units. Much of this interest comes from people within the 57 who need small spaces but there are others currently working from home who may be tempted by the availability of serviced or start up facilities.

Business support needs

- Parking issues were most likely to attract comment but there was also support for measures which would attract and welcome people to the town. Funding advice and support was mentioned by 5%.
- One in three respondents provided their contact details as being interested in helping to formulate business policies in the town. This seems a good level of interest and suggests a good basis for developing the town's business community.

Employment and travel

- Some 44% of those (1077) people who replied to the household survey were currently employed. Two out of three work outside Bradford with Bath, Bristol and Trowbridge the most popular destinations.
- By far the most common mode of transport for work travel was the car with almost two out of three driving to work. The train was also quite well used.
- Education, health and caring and professional were the sectors in which the largest numbers of people worked.
- Two out of three felt there were insufficient employment opportunities for their household within Bradford.
- Employers within the Business survey suggested that there were at least 48 people who work in Bradford and currently live elsewhere but would like to move into the parish.

Additional conclusions

- The evidence from this survey is that many enterprises are small in size and whilst there is growth and development, the extent of job creation is likely to be limited. This suggests that there is unlikely to be a significant reduction in the level of out commuting in the short to medium term.
- There is clearly a demand for small premises, including serviced offices and start up units, which the Council should take into account in forward planning. There is also a significant 'work from home' community who seem fairly self sufficient but who do indicate a demand for meeting and workspace facilities.
- There is a low level of interest in what may be described as business support services and this is perhaps something that the Town Council could consider in partnership with other organisations or larger Authorities.

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Appendix 4 - Viability of Community Facilities

Policies in the Neighbourhood Plan seek the retention of the designated community facilities (Policy C1). Plan policies also provide a framework for the development of new or enhanced facilities. (Policy C2). Proposals for alternative uses for sites where there are existing community uses will therefore be assessed in accordance with the following criteria.

The release of any community facilities to other uses must be fully justified in terms of their contribution to the community and their viability. Any application that involves the loss or part-loss of a community facility must be supported by written evidence that the facility is no longer needed and/or is no longer viable. The level of evidence required will vary according to the extent to which other facilities may be available in the locality but would be expected to include such evidence as:

- current and projected community use
- the nature and condition of any building and the cost of repairs, renovations or improvements needed to allow the facility to continue in operation
- a definition of the catchment area for the facility including the location of the premises in relation to general accessibility for the town
- the location of comparable facilities and their content
- the potential for beneficial relocation of the use into other premises in the community
- evidence of the marketing of the site, which should include sales literature, details of approaches and/or offers to show that it has been offered for sale as a community asset
- evidence that the local community and users have been notified of the intention to close the facility and have not come forward with a realistic proposal to take over the facility including proposals to finance and operate

The importance of particular facilities will vary according to scale and use and it is essential that the community is involved in considering the merits of any facility and the suitability of any proposals for alternative forms of community use. Applicants proposing to redevelop or convert facilities that have been identified as assets will be required to produce evidence that the community has been fully consulted.

It is recognised that not all of the existing facilities satisfactorily meet the current needs of the community. Support will therefore be given to the provision of new facilities where these will enhance community life and meet the needs of a changing population, subject to compliance with other policies in the plan.

Appendix 5 - Green spaces for improvement

The Town Council will seek to encourage the following improvements to green spaces. The locations of these green spaces are shown on the Green Spaces Proposals Map.

Frankleigh House Parkland

- Retain openness of parkland landscape.
- New tree planting to ensure maintenance of parkland character in the long term.
- Any new structures, gates, access tracks or fencing should be located and designed to be sympathetic to the open character of the landscape, and should be accompanied by an appropriate planting scheme.
- New planting to be protected from grazing animals by robust high quality post and rail timber fencing.
- Note: Natural England countryside stewardship grants are available for the restoration of parkland.

River Avon and Canal corridors within the town and in the countryside, by:

- Improving the landscape and biodiversity value of the wider river and canal corridor, including associated native tree and understorey planting to provide habitat for wildlife.
- Controlling use to avoid erosion of the grass verge between the towpath and canal.

The Strips

- Woodland management to enhance biodiversity and landscape value.

Woolley Park Farm frontage onto B3105

- Improve landscape setting to the hamlet and historic buildings at Woolley Green, including the Grade 2 star listed Woolley Grange.
- Provide a landscaped buffer to the workshops, vehicle storage and other sui generis uses, including by:
 - Reinstatement of native hedgerow to rear of visibility splays onto B3105
 - Planting native hedgerow trees
 - Good quality paving, fencing and gates at site entrance.

Poulton Playing Fields

Improve biodiversity and landscape value including softening the edges where housing abuts the playing fields, by:

- improving the species mix and wildflower content of the limestone grassland
- native tree planting to provide shade and shelter, habitat for wildlife
- avenue planting to the edges of the fields to soften views of adjacent housing
- native hedge planting to screen and soften fenced boundaries to rear gardens
- ensuring that characteristic views towards the Avon Valley and Christ Church spire are retained and framed

Allotments within the plan area:

- Sladesbrook and Bancroft (Col Llewellyn Palmer Trust)
- Woolley Allotment Association Allotments
- Shoulder of Mutton (by the Golf Course)
- Frome Road
- private Allotments at Woolley Street

Appendix 6 - Explanation of Terms

Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.

Air Quality Alliance: The Air Quality Alliance was set up by Wiltshire Council, bringing together local stakeholders to examine the air quality problems in Bradford on Avon and to develop proposals for tackling those problems. Stakeholder organisations include Climate Friendly Bradford on Avon, the Preservation Trust, the Seniors Forum, BOACAN, and elected councilors from the Area Board and Town Council.

Air Quality Management Areas: Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.

Birds and Habitats Directives: European Directives to conserve natural habitats and wild fauna and flora.

BoA2026: Local initiative and report for the future of the town to 2026, which lead directly to the decision to prepare a Neighbourhood Plan. Final report available at www.boa2026.net.

Buildings of local interest: Locally important building valued for its contribution to the local scene or for local historical situations but not meriting listed status.

Climate change adaptation: Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities. Climate change mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Community Infrastructure Levy: A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Community Right to Build Order: An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development.

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development plan: This includes adopted Local Plans, neighbourhood plans as defined in section 38 of the Planning and Compulsory Purchase Act 2004.

Economic development: Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).

Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Habitat Regulations Assessment: (HRA) of land use plans is a process to ensure the conservation of natural habitats and of wild fauna and flora where these are sites recognised as 'sites of Community importance' under the EC Habitats Directive.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic environment record: Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

Infill: New development that is sited on vacant or undeveloped land within an existing community or settlement, and that is enclosed by other types of development

International, national and locally designated sites of importance for biodiversity: All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Local Development Order: An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Enterprise Partnership: A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local planning authority: The public authority whose duty it is to carry out specific planning functions for a particular area which in this case is Wiltshire Council.

Local Plan: The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community.

Neighbourhood Development Order: An Order made by a local planning authority (under the Town and Country Planning Act 1990) through which Parish/Town Councils and neighbourhood forums can grant planning permission for a specific development proposal or classes of development.

Neighbourhood plans: A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Planning condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation: A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Primary shopping area: Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

Primary and secondary frontages: Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

Priority habitats and species: Species and Habitats of Principle Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Site of Special Scientific Interest: Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Skyline: An outline of land, buildings or other features defined against the sky.

Special Areas of Conservation: Areas given special protection under the European Union's Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

Special Protection Areas: Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Strategic Environmental Assessment: A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Supplementary planning documents: Documents which add further detail to the policies in the Local Plan.

Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

Town centre: Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.

Transport assessment: A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

Travel plan: A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.

Use Classes: The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'.

Wildlife corridor: Areas of habitat connecting wildlife populations.

Windfall sites: Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.



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