

## **Appendix 1. Report on the Examination of the Wiltshire Housing Site Allocations Plan**



The Planning Inspectorate

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# **Report to Wiltshire Council**

**by Steven Lee BA(Hons) MA MRPTI**

**an Inspector appointed by the Secretary of State**

Date 23 January 2020

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the Wiltshire Housing Site Allocations Plan**

The Plan was submitted for examination on 31 July 2018

The examination hearings were held between 2 April and 16 April 2019

File Ref: PINS/Y3940/429/13

## Abbreviations used in this report

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
BBAB-SAC	Bath and Bradford on Avon Special Area of Conservation
CA	Community Area
DtC	Duty to Co-operate
EA	Environment Agency
FRA	Flood Risk Assessment
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
MM	Main Modification
NPPF	National Planning Policy Framework
NE	Natural England
NFDC	New Forest District Council
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
TBMS	Trowbridge Bat Mitigation Strategy
TA	Transport Assessment
WWSL	Wessex Water Services Ltd
WCS	Wiltshire Core Strategy
WHSAP	Wiltshire Housing Site Allocations Plan

## **Non-Technical Summary**

This report concludes that the Wiltshire Housing Sites Allocations Plan (WHSAP) provides an appropriate basis for the planning of the County, provided that several main modifications [MMs] are made to it. Wiltshire Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

All main modifications are listed in Appendix A. All have been subject to consultation and Sustainability Appraisal (SA). In some cases, I have made amendments to the Council's suggested modifications. These have not materially altered the intent of any policy. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- The deletion of sites H1.2-H1.4, H2.11 and H2.13 to ensure a consistent approach to site selection and national policy, with particular regard to the role of Neighbourhood Plans.
- The deletion of site H2.7, resulting from concerns about the impacts on heritage assets.
- The inclusion of a new site at The Yard, Salisbury to ensure the Plan has been prepared using a consistent approach to site selection.
- The inclusion of site specific policies for all sites which do not have one. This is to ensure that all requirements of the Plan are clearly expressed and provide an effective basis for decision making.
- The modification of site specific policies to ensure all requirements are clearly expressed in the interests of effectiveness.

## Introduction

1. This report contains my assessment of the Wiltshire Housing Sites Allocations Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate (DtC). It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The revised National Planning Policy Framework (NPPF) was published in July 2018 and further revised in February 2019. It includes a transitional arrangement in paragraph 214 which indicates that, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Wiltshire Housing Sites Allocations Plan (WHSAP), submitted in July 2018 is the basis for my examination.

## Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council has requested that I recommend any main modifications [MMs] necessary to rectify matters that make the Plan, as originally submitted for examination in July 2018, unsound or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in Appendix 1.
5. Alongside the Submission Plan (WHSAP.01), the Council submitted a 'Schedule of Proposed Changes' (WHSAP.03). These proposed significant changes to the Plan, including the deletion of some allocated sites, and the allocation of an additional site. On my advice, the Council carried out an additional consultation from September to November 2018. Due to some potential respondents not being notified of this consultation, a further 'targeted' consultation took place between December 2018 and January 2019. This ensured that the consultation as a whole was carried out in accordance with the Statement of Community Involvement (SCI). To all intents and purposes, many of the Proposed Changes were proposed main modifications to the Plan. These Proposed Changes and responses to them were considered through the examination. Where I consider the Proposed Changes are necessary to make the Plan sound, I have recommended them.
6. Following the closure of the hearings, the Council prepared a schedule of 'Further Main Modifications' (FMM), also subject to Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA). These were consulted on between 12 September 2019 and 25 October 2019. Some of these alter in

whole or part the previously consulted on Proposed Changes. The consultation material highlighted where this was the case. As the Proposed Changes had already been consulted on, and discussed at the hearings where necessary and considered by myself, there was no necessity to re-consult on changes already considered. The interests of no party have been prejudiced by this approach.

7. I have taken account of all consultation responses in preparing this report and have made some amendments to the detailed wording of the main modifications. None of the amendments significantly alters the content or intent of the modifications as published for consultation, undermines the participatory processes or SA/HRA that has been undertaken. Where necessary I have highlighted these amendments in the report.
8. The existence of two separate schedules of modifications has the potential to cause some confusion, particularly given that some of the FMMs wholly or partly modify the Proposed Changes consulted on earlier. With this in mind, a single consolidated schedule of main modifications to the Plan, as originally submitted in July 2018, has been prepared. This has resulted in the renumbering of the modifications as originally consulted on but, other than in respect of the detailed wording amendments I have made in the light of consultation comments, their content and effect is unchanged.
9. In adopting the Plan, the Council can also make additional modifications to the Plan so long as they do not, alone or in combination, materially alter the policies of the Plan. Such changes are likely to include minor factual updating and correction of typographical errors etc. The Council consulted on several minor factual updates and consequential alterations to supporting text in its 2018 consultation on Proposed Changes. However, unless identified below, I am satisfied that these alterations to the Plan do not in fact constitute MMs and I have not recommended them as such.

## **Policies Map**

10. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted Development Plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Revisions to Wiltshire Policies Map as set out in WHSAP.28.01-15.
11. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the recommended MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
12. A number of changes to the Policies Map were consulted on alongside the Schedule of Proposed Changes (EXAM.01). Additional changes resulting from the examination were identified as a separate appendix to the consultation on

Further Main Modifications. In this report I identify any amendments that are needed to those further changes in the light of the consultation responses.

13. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed and the further changes published alongside the MMs.

## **Assessment of Duty to Co-operate**

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation. The Council is obliged to co-operate with relevant local authorities and other prescribed bodies in relation to 'strategic' matters. These are defined as matters that would have a significant impact on at least two local planning authority areas.
15. The Council has provided statements relating to the DtC (PSCON.13, WHSAP.23). The cross boundary strategic matters which are relevant to this Plan relate mainly to the individual and cumulative impacts on the strategic road network, flooding and on biodiversity assets. The statements identify other important issues, such as the effect of development on the setting of Salisbury Cathedral. It is debatable whether some of these would constitute 'strategic matters' as defined in the Act. Nevertheless, there is evidence of long-term engagement with relevant prescribed bodies and neighbouring authorities on all of these issues.
16. While the extent and regularity of this engagement differs across organisations, I am satisfied that what has been carried out is relevant and appropriate to the scope of the Plan and its likely effects. The engagement has culminated in a range of agreed mitigation measures to address the impacts of development and/or Statements of Common Ground (SoCG) with prescribed bodies. This demonstrates on-going engagement with relevant bodies and a commitment to addressing relevant strategic matters.
17. Matters relating to meeting unmet housing needs from neighbouring authorities are outside the scope of the WHSAP and do not constitute a failure of the DtC. Other areas of concern raised are more related to general matters of engagement than any failure to comply with the DtC.
18. Overall, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the WHSAP and that the DtC contained in Section 33A of the 2004 Act has therefore been met.

## **Assessment of Soundness**

### **Background**

19. The WHSAP has been prepared in the context of the Wiltshire Core Strategy (WCS) which was adopted in January 2015. The WCS sets out the overall vision and spatial strategy for the County up to 2026. It contains strategic policies which define the quantum and distribution of growth within the three

defined Housing Market Areas (HMAs) within the County and the hierarchy of settlements where development is expected to take place.

20. As set out in Section 3 of the Plan, the WHSAP has three objectives. The first relates to ensuring there is a clear definition of the extent of built-up areas through a settlement boundary review. This is dealt with under Issue 3. The second objective is to help demonstrate a rolling five-year supply of deliverable land for housing development. The third is to allocate sites at the settlements in the County that support the spatial strategy of the WCS.

### **Main Issues**

21. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified three main issues upon which the soundness of this Plan depends. Under these headings my report deals mainly with matters of soundness and does not respond to every point raised by representors.

### **Issue 1 – Is the WHSAP consistent with the Wiltshire Core Strategy?**

22. Firstly, paragraph 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. This provides clarity with regard to the preparation of Neighbourhood Plans. The WHSAP is silent on this matter. The Council has determined that all allocations in the WHSAP should be strategic in nature. Insofar as all allocations are deemed necessary to support the WCS, and where there are no other means of meeting these objectives, then such an approach is justified. To be consistent with national policy, a main modification is therefore necessary to address this omission (**MM1**).
23. The WCS establishes a housing strategy based on an overall requirement of at least 42,000 dwellings between 2006 and 2026. This is split into three HMAs. This translates to a requirement of 5,940 in the East Wiltshire HMA (EW), 24,740 in the North & West Wiltshire HMA (N&WW) and 10,420 in the South Wiltshire HMA (SW). Taking account of completions and commitments, at the time of the examination hearings, the Council's evidence indicated a residual requirement in each HMA as follows;
  - 5 dwellings in EW;
  - 1109 dwellings in N&WW; and
  - 1331 dwellings in SW.
24. The WCS states that HMAs are the most appropriate scale at which to disaggregate housing. The HMA figures are also the basis of which any assessment of housing land supply will be assessed. In addition to these figures, the WCS also sets out a range of 'indicative' requirements for each 'Community Area' (CA) the Plan identifies. The WCS states that these figures are not meant to be prescriptive or inflexible, but that they should be considered material in defining the strategy for distribution of housing – including any assessment through subsequent plans such as the WHSAP. The indicative requirements for the CA therefore provide an important



consideration in determining the scope of the Plan and the distribution of sites across the area. However, in determining the overall consistency with the WCS, the HMA requirements take precedence.

25. When recommended main modifications on individual sites are taken into account, the WHSAP would contribute the following number of dwellings during the plan period:
  - 161 in EW;
  - 1233 in N&WW; and
  - 684 in SW.
26. This level of supply is likely to be supplemented by windfalls. There is good evidence that windfalls have been a substantial part of the housing land supply and will continue to be so. This stance was also taken by the WCS Inspector. The Council's submitted windfall estimates are based on a different methodology to that which the WCS Inspector considered appropriate. The figures produced by this, which were more optimistic, were disputed at the hearings. The Council produced a paper (EXAM.17) which compared the 'accepted' approach with their preferred approach and a third 'amended' approach.
27. This provided a range of windfall figures for each HMA. These were between 314 and 823 for East Wiltshire, 1514 and 2209 for N&WW and between 587 and 743 for SW over the remainder of the plan period. Overall, windfalls are expected to account for between 2415 and 3775 dwellings. The lowest figure for all three is derived from the WCS methodology, the highest is from the Council's revised methodology. Whatever figure is selected, this represents a significant proportion of the overall supply. This creates a degree of uncertainty and risk. Indeed, the amount of housing expected through windfall exceeds what is being allocated in this Plan. Nevertheless, there is good evidence that windfalls have been a constant source of supply during the plan period and there is compelling evidence that this will continue into the future. The WCS provides scope for this type of development and I see no reason to consider the WHSAP to be unsound on this basis.
28. EXAM.17 explains the rationale for the three different assessments of windfall. The higher figure is based on the assessment of large site windfalls over the plan period as a whole, rather than just the first five years. There is evidence of a steady supply of large site windfalls coming forward and there is no reason why these should not be included as part of the long-term assessment of provision. The figures produced are in my view based on a robust assessment and provide some comfort over the likely level of delivery.
29. Based on the supply figures set out in TOP.03C, the WHSAP would result in a small surplus in both EW and N&WW. This would be supplemented by windfalls to provide a degree of flexibility and comfort over delivery. This level of 'over supply' would not be significant or lead to any particular inconsistency with the WCS.
30. The situation in SW is different. Even with allocations, there would still be a shortfall of around 647 dwellings. The Council is essentially relying on

windfalls to make-up the shortfall. Depending on which windfall figure is used, and assuming all other commitments come forward as expected, there would either be a deficit of around 60 dwellings or a small surplus of 96 dwellings. I acknowledge that the Council's approach results in a degree of risk in terms of both meeting the overall HMA requirement and ensuring there is a five-year supply of deliverable housing land.

31. However, there are a number of reasons why, in the circumstances and context of this Plan, it is not necessary for additional housing sites to be allocated in this Plan in order for it to be sound. Firstly, any deficit is unlikely to be significant in the context of the overall housing requirement of the WCS or for the SW HMA. Secondly, and importantly, the Council is also in the process of carrying out a review of its Local Plan. This is due to be adopted in 2021. This review provides the Council with the opportunity to consider the need for additional sites, as well as assessing the scale of development required in the light of current national policy and its distribution across the County. I am also conscious of the requirement for Local Plans to be reviewed every five years and the relative age of the WCS.
32. In this context there would be little to be gained by further delaying adoption of this Plan, prolonging the uncertainty around the sites that are already allocated, particularly in EW and N&WW, and delaying the actual delivery of housing. The WHSAP provides additional housing supply and certainty with regard to allocated sites. In this context, the WHSAP is fulfilling its objectives of helping to meet the five-year supply and supporting the spatial strategy set out in the WCS.
33. At the CA level, the WHSAP would not result in an exact 'match' between the indicative requirements for each area and the planned supply. In some areas, there would still be a shortfall, while in others there will be a surplus. This is mainly as a result of development outside the scope of the Plan. Some of the shortfalls are material, particularly in Trowbridge and Salisbury. However, the WCS is clear that these figures are indicative only. It is not absolutely necessary for indicative requirements to be met for the Plan to be consistent with the WCS spatial strategy. The CA figures are helpful in guiding where the Plan should look to 'intervene' and indicating where the most appropriate locations are for development. In this regard, the distribution of development in the WHSAP still supports the strategy in the WCS, particularly in relation to the focus of development on Trowbridge and Salisbury. Where shortfalls do exist in individual CAs, this is unlikely to result in any particular impact on overall supply or delivery. This is particularly the case when considering the level of delivery proposed at the HMA level and across the County as a whole. For the Plan to be sound it is not therefore necessary to allocate additional sites within these locations.
34. It is also unnecessary to seek to meet shortfalls in one CA by increasing growth in another. For example, Salisbury and Trowbridge have been identified as sustainable locations for growth. Redistributing any 'shortfall' from these locations to other areas through the WHSAP would not necessarily result in a sustainable or WCS compliant strategy. This would, in effect, be re-drafting the broad distribution strategy, which is outside the scope of this Plan. In any event, this redistribution has already taken place to an extent, with some CAs receiving higher numbers of new dwellings than originally expected

through windfall development and/or Neighbourhood Plans. This also provides some comfort that the WHSAP would not be seen as a barrier to housing delivery or WCS compliant development taking place elsewhere. Again, in the context of the Local Plan review taking place, delaying the adoption of this Plan to address such issues would also not be justified.

35. Overall, I am satisfied that the WHSAP makes adequate provision to meet housing requirements and is consistent with the strategy set out in the WCS.

**Issue 2 - Are the proposed sites justified, effective and consistent with national policy?**

Sites – General Issues

36. The general process of site selection involved multiple stages of assessment, as set out in the Site Selection Process Methodology (TOP.02). The Council established at an early stage that the WHSAP would only seek to 'intervene' where it considered it necessary to do so. The initial 'screening' stage focussed on CAs where the Council identified a need for the WHSAP to 'intervene'. Areas where the indicative needs of the CA were already met were excluded from further consideration. While the WCS does not necessarily preclude additional development in these locations, narrowing the scope of search to those areas where there is a so-called 'strategic imperative' to intervene is not an unreasonable approach. In this way, the WHSAP is clearly seeking to support the spatial strategy of the WCS.
37. The second stage of the 'sifting' process involved considering constraints to development as identified in the Strategic Housing Land Availability Assessment (SHLAA) and WCS. Locations considered unsuitable for development were screened out at this stage. Locations where the Council considered there to be no need to intervene were also excluded at this stage. In line with the WCS, sites in some 'Large Villages' and 'Local Service Centres', where indicative needs were already met, or where Neighbourhood Plans were able to address local housing needs, were also excluded at this stage. However, not all Local Service Centres or Large Villages were excluded where the Council considered a need exists. Sites in 'Small Villages' were not considered as the WCS limits growth in these locations to infill only. Narrowing the scope of the Plan through stages 1 and 2 is a reasonable approach.
38. Remaining sites were then considered through the SA. Sites with major adverse effects and no satisfactory mitigation were rejected at this stage. Remaining sites were identified as 'preferred sites' and taken forward to more detailed assessment. Sites considered suitable after this assessment have been included in the Plan. The process has been thorough, and all sites have been considered on a consistent basis. Disputes about the Council's approach and findings are to be expected. These are due to differences in planning judgement and do not undermine the site selection process undertaken. I am therefore satisfied that this followed a reasonable and logical rationale in the context of the WCS and the purpose of the WHSAP.
39. Concerns have been raised that the WHSAP primarily identifies sites outside defined settlement boundaries and that this is contrary to WCS Core Policy 2.

This states that development will not be permitted outside defined settlement boundaries, except in relation to certain 'exception' policies. However, other parts of that policy, and the delivery strategy more generally, highlight the likelihood that additional housing land might be identified through subsequent plans such as the WHSAP or Neighbourhood Plans. There is nothing to suggest that all allocations in these plans would be within settlement boundaries. Moreover, the evidence does not support the idea that all housing needs could be realistically met within settlement boundaries. The WCS makes provision for this. It would not therefore be logical or practical to conclude the allocations in the WHSAP are unsound on this basis. The Development Plan should be read as a whole. In doing so, I consider it reasonably clear that Core Policy 2 does not preclude the Council from considering additional allocations outside settlement boundaries. The allocated sites are therefore not unsound on this basis.

40. Only sites H1.1, H2.1, H2.7, H2.11 and H3.1 are subject to specific policies. The remainder are addressed under general policies H1, H2 and H3. The supporting text for sites without specific policies often sets out detailed requirements or constraints that would affect the determination of any planning application. Reliance on supporting text in these circumstances would generally not form an effective means of decision making on individual applications and would be unsound. To address this, main modifications are needed to elevate much of the supporting text to policy. While in many cases this will not alter the intent of the Plan, it will ensure the Council has a clear and effective basis on which to determine applications.
41. Policies H1, H2 and H3 provide little in the way of guidance for how decision makers should react to a proposal. They are neither effective policies for the determination of planning applications for each site, nor are they consistent with paragraph 154 of the NPPF. This states that only policies that provide a clear indication of how a decision maker should react to a development should be included in the Plan. Subject to other main modifications, these policies would no longer serve any purpose. They should therefore be deleted and redrafted as supporting text (**MM12, MM21, MM96**).
42. The allocations in the WHSAP are predominantly greenfield sites on the edge of existing settlements. There will be an inevitable degree of encroachment into the open countryside and an urbanisation of existing open and undeveloped land. This is likely to result in some degree of harm to the existing character and appearance of each affected area. Nevertheless, in ensuring there is a continuing supply of housing in the area to complement that coming forward through the WCS, Neighbourhood Plans and windfall, there is a need to identify greenfield sites. The allocations are therefore sound in this regard.
43. The evidence base for the Plan and site selection process has identified a number of constraints and issues for each site that any development would need to address. A number of these apply to multiple sites. To avoid repetition, I shall address a number of these below.
44. Issues relating to biodiversity affect a number of sites across the County. Of particular note are potential impacts on the Bath and Bradford on Avon Bats Special Area of Conservation (BBAB-SAC). All sites in Trowbridge (H2.1-H2.6)

and land at Barters Farm (H2.10) have the potential to cause harm to bats. However, provided potential impacts can be avoided or adequately mitigated, then development need not be ruled out in principle. The HRA confirms that with appropriate mitigation in place, the development proposed in the WHSAP would be unlikely to lead to adverse impacts on the integrity of the BBAB-SAC. Mitigation would however be needed to address both the potential loss and/or deterioration of habitat and recreational pressures. The HRA recommends measures relating to the retention of trees and hedgerows, the provision of wide landscape buffers and landscaping and contributions to measures that will be outlined in the Trowbridge Bat Mitigation Strategy (TBMS).

45. Work is continuing on the TBMS, with the intention that it will be adopted by the Council as a Supplementary Planning Document (SPD). A draft was consulted on in February 2019. The aim of the document is to provide a detailed approach to considering the individual and cumulative impacts of development in Trowbridge. While this document is outside the scope of the examination, I am satisfied that it is being prepared in a robust fashion with the input of Natural England. There is a reasonable degree of comfort that the TBMS will therefore become a useful tool in helping to guide the particulars of any development. I have noted concerns that the TBMS is not yet finalised. Nevertheless, the Plan will make it clear that impact assessments will be required which will identify mitigation measures and the supporting text outlines the types of measures that might be expected. The Council will still therefore be able to require appropriate mitigation.
46. The TBMS does not need to be in place to determine sites are acceptable in principle. Moreover, the TBMS is not needed in order for the Council to assess the impact of development or for developers to understand what is expected of them. With or without the TBMS in place, developers will still need to demonstrate that their specific proposals will not result in unacceptable harm. The Plan already alludes to various measures, including relating to layout, landscape buffer zones, retention of mature landscaping, lighting and the need to make financial contributions toward off-site mitigation and monitoring. This is likely to include the creation of Suitable Alternative Natural Green Space(s) (SANG) and monitoring regimes. It is unlikely that all strategic off-site mitigation measures identified by the TBMS would be in place prior to the delivery of some of the housing. Nevertheless, I am satisfied that this is not an impediment to development coming forward on affected sites and that in the long term, such mitigation will be effective. Furthermore, the types of on-site measures identified provide a suitable basis on which proposals can come forward.
47. Modifications will however be needed to give greater clarity on what is likely to be required and to ensure a consistency of approach. As highlighted above, modifications are also required to elevate requirements relating to bats into policy and ensure guidance is clear and consistent. Some of the existing supporting text relating to bats is very specific, particularly with such things as the width of landscape buffer zones. There are risks that this might conflict with the final TBMS or not be the most appropriate solution for an individual site. Being inflexible in this regard might have unintended consequences in terms of ensuring the mitigation proposed is the most appropriate for the site in question. I have therefore recommended modifications to remove this level of specificity and allow some flexibility. Rather than weakening the controls,

this will allow the developers to identify bespoke proposals that are best suited to each site. This would also allow the Council to assess each mitigation scheme on its merits.

48. Sites in Salisbury, Warminster and Durrington have been identified as having potential risks associated with impacts on the River Avon Special Area of Conservation (SAC), particularly in relation to phosphates. The HRA concludes that development in these areas will need to demonstrate they will be phosphate neutral in order to ensure there will be no adverse effect on the integrity of the SAC. A 'Memorandum of Understanding' has been entered into by the Environment Agency (EA), Natural England (NE), New Forest District Council (NFDC), New Forest National Park Authority (NFNPA), Wessex Water Services Ltd (WWSL) and Wiltshire Council. An Interim Delivery Plan for Phosphate Neutral Development was published in January 2019. This sets out the types of mitigation measures that could be implemented to achieve this aim. Those that are identified as potential on-site measures are not unusual. For example, measures relating to green infrastructure, sustainable drainage, water efficiency and sewerage can all serve to mitigate any potential risks.
49. There is also a SoCG (SoCG26) between the same parties. These also describe the on- and off-site measures that will be required to ensure phosphate neutrality. The assessment of risk is robust and the protection of the River Avon SAC can be achieved without undue risk to the delivery of sites. Modifications are still necessary to ensure new site policies, where relevant, highlight the requirement for measures to protect the integrity of the River Avon SAC. Modifications to relevant supporting text are also necessary in the interests of clarity. These will ensure that developers are fully aware of their responsibilities with regard to the protection of the SAC and the Council is able to assess any impacts. Alongside relevant existing WCS policies, when modified the WHSAP should not lead to adverse effects on the integrity of the River Avon SAC.
50. The issue of flood risk was also assessed through the site analysis undertaken. The outcome of this is that the majority of sites are wholly in Flood Zone 1. Sites H2.4, H2.5, H2.6 and H2.9 are partially within Flood Zone 2 or 3. Nevertheless, it has been established that residential development need not intrude into affected parts of any site. These areas are included in the site boundaries to facilitate delivery or provide scope for mitigation measures only. In these cases, flooding issues can be dealt with on a site-by-site basis and there is no clear evidence to suggest development on these, or any other allocated site, would result in undue risk to the new dwellings or increased risk of flooding elsewhere.
51. The overall approach taken is therefore consistent with the sequential, risk-based approach in national policy. The Environment Agency has also raised no objections on this basis. However, owing to the scale of most sites, or their proximity to water courses, there will still be a need to demonstrate compliance with WCS and national policy on flooding. Modifications are therefore necessary to highlight the need for flood risk assessment and to provide certainty and consistency about what will be expected.
52. Clearly, the development proposed in the WHSAP will result in an increase in traffic, particularly in Trowbridge and Salisbury. There is evidence to suggest

that some locations in both settlements are subject to existing traffic problems. This is not unusual in large towns and cities. There are Transport Strategies in place for both Trowbridge (WHSAP.07) and Salisbury (WHSAP.08/08A). These identify the problems and outline potential mitigation measures. Subject to appropriate mitigation taking place, neither these documents, nor any other elements of the evidence base, conclude that the development proposed in the WHSAP would individually, or cumulatively with other development, result in severe transport problems. Importantly, neither the Highway Authority nor Highways England have raised any objections to the principle of development identified in the WHSAP.

53. Where necessary, the supporting text and/or policies of the Plan identify the need for measures to address the impacts of development, including new access links and improvements to existing junctions or improvements to support walking and cycling. This will usually be based on the provision of a Transport Assessment (TA) to assess the scale of any impact and suggest mitigation measures. This is not unusual. There is no clear evidence therefore that any site should be considered unsound in principle on the basis of transport impacts. This does not negate the need for such issues to be considered on a case-by-case basis, but there is adequate evidence in place to give comfort that appropriate solutions can be found to minimise the effect of development. There are instances where the Plan would be more effective if specific reference to where Transport Assessments will be expected to focus and/or where improvements will be required.
54. There is an inconsistent and sometimes unclear approach to how references to the need for infrastructure contributions are made. In places, it is implied that what is being required would go beyond the normal approach as set out in the WCS. This is not justified. A number of main modifications are therefore needed to ensure the approach is clear, consistent, justified and effective with regard to any obligations.
55. The Council has had regard to all of the above constraints in the selection of sites. Other than where specifically referred to below, I am satisfied that there is a reasonable prospect of development being able to take place without unacceptable harm. This will clearly be dependent on the nature of any proposals put forward by developers. However, these constraints are not enough to render sites unsound in principle. This does not negate the need to assess proposals on their merits and there will clearly be a need for developers to come forward with well-designed and sensitive proposals that have proper regard to the character and context of every site. The main modifications will ensure the Council has an effective means of ensuring this.
56. Main modifications **MM9, MM10, MM11** and **MM22, MM68, MM69, MM97, MM120, MM121** are necessary to address the issues raised above. Others are identified within the main modifications for individual sites where other changes are also necessary.

#### Sites – Specific

57. The soundness of individual sites is considered below. Where an issue is not referred to specifically then, subject to any modifications referred to in

paragraphs 36-55, it can be taken that in all other matters the site is suitable to be allocated.

### East Wiltshire Housing Market Area

#### Tidworth Community Area

58. Land at Empress Way (H1.1), Ludgershall is identified for the development of around 270 dwellings. Part of the site is already subject to a planning permission. The lack of natural boundaries to the south can be addressed through sensitive design and layout. Development would extend no further south than development under construction to the west. In this way, it would integrate well with its surroundings.
59. The WCS identifies Ludgershall as a Market Town, and thus having potential for growth. The site itself is adjacent to an area of existing development and relatively well related to facilities in Ludgershall and public transport. The potential for improving accessibility is recognised in the policy. There are no insurmountable constraints to impede delivery and thus the site is sound in principle.
60. The policy and supporting text relating to the land for a primary school is unclear and modifications are necessary to give guidance on where in the site the land should be identified. The evidence does not support the holding of land for a primary school in perpetuity. Modifications are therefore necessary to make this clear.
61. There is nothing to suggest the proximity to a sewerage treatment plant is an impediment to development in principle. However, an odour assessment will still be needed to help guide layout and ensure a satisfactory living environment can be created. To ensure clarity, the policy and supporting text should also include reference to various requirements, including the need for a Transport Assessment (TA) and the specific assessment of trigger points for delivery of an access via Simonds Road, a flood risk assessment (FRA) and measures relating to design and layout. Main modifications to both policy and supporting text are needed to address all of these points and ensure effectiveness (**MM13 – MM16**).
62. The scope of the WHSAP established that the Council would generally not intervene at a local level where a Neighbourhood Plan was 'sufficiently progressed'. TOP.02 states that Neighbourhood Plans would only be considered 'sufficiently progressed' if they had reached Regulation 16 stage. The Market Lavington Neighbourhood Plan was not at this stage at the time of the examination hearings. Nevertheless, significant progress has been made and there is a reasonable likelihood that it will progress to examination and referendum. The most recent version of the Neighbourhood Plan, which has been subject to consultation, includes H1.3 and H1.4 but not H1.2.
63. There is a clear intent for the Market Lavington Neighbourhood Plan to allocate sites to meet local needs. This is consistent with the WCS in relation to Local Service Centres. In this context, the Council no longer considers any intervention to be necessary. The Neighbourhood Plan is therefore capable of meeting local needs. In addition, the scale or complexity of the development here is not such that a strategic allocation is necessarily required. Moreover,



other Neighbourhood Plans are in preparation elsewhere in the CA, such as West Lavington, which could contribute to meeting housing needs in the CA. Any resulting shortfall against the indicative CA requirement would not be significant. Deletion of these sites from the WHSAP would not have a materially harmful impact on housing delivery in the area.

64. In this context, to continue to allocate sites in the WHSAP for this area would be contrary to the aims of national policy, in particular paragraph 184 of the NPPF, which aims to give communities direct power to deliver the sustainable development they need. I therefore find that allocations H1.2-H1.4 are unsound and should be deleted from the Plan, with consequential changes to housing numbers and supporting text (**MM2, MM4, MM12, MM17-MM20**).

#### North and West Wiltshire HMA

#### Trowbridge Sites – General Issues

65. The spatial strategy for Wiltshire set out in the WCS identifies Trowbridge as a Principal Settlement and a focus for growth. The WCS establishes an indicative requirement of 6,810 dwellings, of which 1,649 were still to be identified outside the WCS. Revised expectations over the delivery of WCS allocations increased the residual needed to meet the indicative requirement to around 2,230. Even with the allocations in the WHSAP, the indicative requirement will not be achieved. For reasons given elsewhere, I do not consider it necessary for the Council to identify additional sites to meet this shortfall. However, to support the spatial strategy, and ensure a continuing supply of sustainable housing, it is still appropriate and necessary for the WHSAP to identify additional growth in this location.
66. The sites identified all constitute urban extensions. The WHSAP allocates six sites around the edge of the existing built-up area that would provide about 800 additional dwellings. Main modifications discussed below will increase this to 1,050. With appropriate mitigation in place, there is no clear evidence to suggest that the cumulative impact of these allocations, along with other growth planned for the areas, would be severe in relation to highways, local services and facilities or biodiversity. As well as specific modifications described for each site, consequential changes to housing numbers will have to be reflected in the Plan (**MM6, MM8**).
67. WCS Policy 29 states that an additional 950 dwellings only will be allowed to be developed once improved secondary school has been provided. The sites in the WHSAP are not subject to any phasing in relation to secondary school provision. Concerns have been raised over consistency with the WCS in this regard and ensuring sufficient school places exist. I am satisfied, however, that in seeking to ensure a continuing housing supply in Trowbridge, the growth envisaged would not result in unacceptable issues with school places in the medium to long-term. While delivery of the strategic allocation, and associated secondary school provision at Ashton Park, is slower than expected, there remains a reasonable degree of comfort that additional secondary school provision will be coming forward. The WHSAP and WCS also both include provision for funding contributions where necessary to provide for school improvements. Adequate provision is therefore in place for secondary school education.

68. The WHSAP makes provision for a new primary school on Elm Grove Farm (H2.1). The latest evidence suggests that a new school is no longer necessary and additional school places can be achieved in other ways. Again, with appropriate contributions toward primary school provision being made in line with WCS policy, there is no reason to conclude that there will be insufficient primary school places to meet the needs generated by development. Overall, the Plan is sound in this regard. Modifications are however needed to the supporting text to reflect the changes in circumstances in the town (**MM23**), in the interests of a justified plan.
69. Site H2.4 (Church Lane), H2.5 (Upper Studley) and H2.6 (Southwick Court) are closely related to each other and the Southwick Country Park. While all these are likely to come forward independently of each other, their close physical relationship could have particular implications, particularly for heritage, landscape, biodiversity and highway access if they do not take account of each other in terms of layout and the provision of mitigation measures. To be effective, each policy should make it clear that regard must be had to development taking place in other sites. Furthermore, both individual and cumulative effects on the Country Park must be taken into account.
70. This approach should not prejudice the delivery of each site. The recommended modifications make it clear that mitigation measures must be considered on a comprehensive and consistent basis. All this is likely to mean in practice is that schemes coming forward must have regard to other proposals in the development pipeline and ensure they are not mutually exclusive or prejudicial to each other.
71. Sites H2.1, H2.2, H2.3 and H2.6 are affected to one extent or another by the North Bradley and Hilperton Neighbourhood Plans. The North Bradley Plan is in preparation, whereas the Hilperton Plan is made. Trowbridge is identified as a Principal Settlement in the WCS and a focus for strategic growth. It is justifiable therefore for the WHSAP to identify land for growth. The scale of requirements for Trowbridge goes beyond what is likely to be identified in these Neighbourhood Plans. The cumulative scale, complexity and significance of the development – and the importance it has for delivering the WCS – justifies strategic allocations. Both Neighbourhood Plans also reflect the Council's intention to bring forward development in the locations identified in the WHSAP. The allocations are therefore sound in this regard.

### Trowbridge – Site Specifics

72. Land at Elm Grove Farm (H2.1) is identified for 200 dwellings. While development would extend development into an open and undeveloped area, the site is largely contained by railway lines to the east and an industrial estate to the south-east. The site is in a relatively accessible location on the edge of the town and is suitable in principle. However, the removal of the school requirement provides some additional scope for development and the approximate capacity figure of 200 is no longer justified. The Council's revised assessment of 250 units is more appropriate and justified figure to use. Modifications to the policy and consequential changes to the housing numbers are therefore necessary.

73. The policy identifies the need for junction improvements, a new through road and improvements relating to walking and cycling. This should be sufficient to address any potential transport impacts. The supporting text already identifies the presence nearby of Grade II Listed Drynham Lane Farmhouse and the potential for archaeological remains on the site. The Grade II Listed Southview Farmhouse could also be affected by development of the site and thus should be referred to in the supporting text. These factors do not mean that development cannot proceed in principle, though clearly any proposal would have to have due regard to the setting of these assets. To be effective, the policy should identify these constraints.
74. While there is no longer any need for Policy H2.1 to safeguard land for a school, the policy still requires improvements to the existing Queen Elizabeth II field. This is justifiable, but it is necessary for the field to form part of the overall site. Figure 5.5 and the policies map should be amended to reflect this. Although sound in principle, modifications are therefore necessary, as described above, to ensure the policy is justified and effective (**MM24-MM31**).
75. Land off the A363 at White Horse Business Park (H2.2) is located to the west of the existing business park in the open countryside between the town and the village of North Bradley. The supporting text highlights several constraints that must be addressed, including the need to ensure development does not coalesce with North Bradley, that existing landscape features are retained, issues relating to bats, and the need to provide high quality development in what is a gateway site to the town. These are all justified and appropriate requirements.
76. The site contains heritage assets that could be affected by development. There is scope within the site to ensure a satisfactory form of development can take place which need not result in unacceptable harm to the setting of these assets. Nevertheless, they should be referred to in both policy and supporting text in the interests of clarity and effectiveness. The recommended main modifications highlight the particular importance of the Baptist Burial Ground. Seeking to enhance the setting of this asset does not conflict with national policy and reflects the nature of the site and the potential for development to facilitate improvements.
77. The Plan is currently silent on highway access. Safe and suitable access to the site could be achieved from the A363. Reference to this in policy would provide a degree of clarity. The need for any additional points of access could be considered as part of the comprehensive masterplanning of the site. The policy as modified does not preclude this. However, considering the constraints that exist, there is insufficient evidence to justify identifying a second access as a requirement of the policy.
78. The figure of 150 units does not reflect the most recent assessment of the site's capacity. In considering the site's heritage, biodiversity and layout constraints, a precautionary approach suggests modification to increase capacity to 175 would be justified. Provided that constraints can be addressed, this would not necessarily preclude additional dwellings coming forward through a comprehensive masterplan. Nevertheless, setting a figure too high in the Plan could result in undue pressure on heritage and biodiversity

assets. The site boundary does not reflect the accurate developable area. Accordingly, the policies map should be amended to ensure accuracy.

79. The site is in multiple ownerships. Considering the nature of the site, and the features it contains, it is reasonable for the policy to seek to ensure a comprehensive approach to development through some form of masterplan. It will be for the Council to determine the level of information it needs to provide sufficient comfort that the overall development will not result in harm and there is no reason this requirement should prejudice development. It should not be unduly difficult for developers of neighbouring plots to liaise with each other, and the Council, in preparing acceptable schemes. This also applies to other sites where similar requirements are in place.
80. The principle of development in this location is therefore sound. However, main modifications **MM32-MM39** are necessary to ensure site H2.2 is justified, consistent with national policy and effective.
81. Land adjacent to Elizabeth Way (H2.3) is allocated for 205 dwellings. This takes up land on what is known as the Hilperton Gap between the recently built Elizabeth Way distributor road and the edge of Trowbridge. While the development would result in an obvious narrowing of the 'gap' between settlements, the road is already a large and highly visible physical feature running through the gap. This constitutes a discernible degree of encroachment in the countryside and change in the character of the area. Development to the west of the road would still be well related to the edge of Trowbridge while ensuring that coalescence with Hilperton would not take place. Development here would therefore be a logical location for an urban extension.
82. Although the layout of development will be guided by constraints, there is no reason why new housing would need to appear disconnected or separate to Trowbridge. The supporting text sets out several necessary and justified requirements relating to design, layout, biodiversity, accessibility improvements and the protection of heritage assets. When given the status of policy, these requirements will provide an effective framework for determining applications and ensuring an appropriate form of development is delivered.
83. Now the road is complete, the site boundary no longer reflects the developable extent of the site. A small portion of the identified site also takes in an area of undeliverable garden space. This does not affect the delivery of the site as a whole, but the policies map should be amended to reflect this. The change to the extent of the site results in a larger area for development. This, coupled with an overly pessimistic view of capacity, means that the figure of 205 dwellings is not justified. A figure of 355 would be a more realistic assessment. Modifications **MM40-M47** are necessary to ensure the Plan is justified and effective.
84. Land at Church Lane (H2.4) is allocated for 45 dwellings. The site is made up of open fields between the edge of the settlement and the Lambrok Stream. These are recognised constraints relating to heritage, biodiversity and drainage. There is nothing to suggest that these would prejudice a high quality form of development in the northern part of the site. Any impact on these assets can be assessed by the Council at the time of an application. The

site would result in a relatively small and logical extension to an existing residential area. The principle of development here is sound.

85. Access from Frome Road is acceptable in principle, but alterations to create this access could have some effect on listed buildings. The policy for the site should therefore highlight the need for measures to minimise any associated paraphernalia. The supporting text should also make clear that development should avoid the paddock to the rear of the listed buildings. This will provide developers with necessary clarity and certainty over the scope of development.
86. To ensure effectiveness in relation to biodiversity and drainage mitigation, the site area should be extended to the stream. This will require consequential changes to the policies map. To provide certainty, the policy also needs to be explicit about expectations in design, layout and the relationship between development and heritage assets. While the allocation is acceptable in principle, main modifications **MM48-MM55** are necessary to ensure the Plan is effective and consistent with national policy.
87. Land at Upper Studley (H2.5) has been allocated for around 20 dwellings. Subject to appropriate mitigations relating to issues of design quality, biodiversity, access and drainage, the site represents a logical extension to Trowbridge and an opportunity to enhance the visual quality of the urban edge. The main constraints are familiar to all Trowbridge sites, but there is nothing to suggest development would result in unacceptable harm, either individually or in combination with other development. The allocation is therefore acceptable in principle.
88. The capacity assessment of 20 is also unduly pessimistic when considering the likely extent of the developable area. Such a restriction is not justified. A figure of approximately 45 dwellings is a more appropriate figure. Main modifications **MM56-MM61** are necessary to ensure a clear and effective policy framework is established, considering both the site's individual characteristics, but also the need to be mindful of the cumulative impacts of development occurring elsewhere nearby.
89. Southwick Court (H2.6) is allocated for around 180 dwellings. It comprises open fields on the edge of the settlement. The site is subject to several constraints relating to heritage, drainage and biodiversity. As a result, development is only suitable on the eastern part of the site. Although the Plan is silent on access, the Council has indicated a preference for access to be taken from Frome Road. This would result in a relatively long access road crossing the open part of the site. Achieving a satisfactory form of development will be challenging. Nevertheless, I am satisfied that with great care, there is scope for development on this site and thus the allocation is acceptable in principle.
90. The Council has taken the various constraints of the site into account in its selection and the supporting text identifies many of the measures necessary to deliver an acceptable form of development. These take account of the nature of land in the west of the site, the importance of the setting of the Southwick Court Farmstead, the need to retain as many of the natural features of the site as possible and the necessity to have regard to drainage

and biodiversity issues related to the Lambrok Stream and bats. In the interests of effectiveness, modifications will be necessary to elevate these matters into policy and to provide greater clarity on matters such as access, drainage and infrastructure. In all cases, further guidance and information on what will be expected from developers should be provided.

91. The delivery of the access road is clearly one of the most sensitive issues, as this would have to cross open land and would need to bridge the stream and take account of the water meadows. Nevertheless, the evidence is sufficient to support the view that, in principle, a satisfactory form of access could be provided. Notwithstanding the heritage issues with the site, Historic England has not objected to this allocation and has been in discussions about the measures that would need to be taken to ensure impacts are minimised. A suitable policy framework could be established to ensure the Council can adequately assess any impacts.
92. The gap to North Bradley would be reduced, but would still exist, particularly in relation to the football ground. The existing gap along Woodmarsh would also be maintained. The solar farms to the south do not alter this conclusion. While clearly not agricultural in nature, the solar panels do not have the character or permanence of residential development. They are also some distance from the southern extent of any likely development. As such, while there would be an inevitable change in the character of the area, the risk of coalescence between Trowbridge and North Bradley or Southwick would not be significant.
93. The proposed main modification as published for consultation includes reference to an emergency access from the north of the site. Concerns have been raised over this. The intent was to make it clear that no vehicular access other than an emergency access would be permitted from the north. The wording of the MM reflects this by stating that the only access from the north would be an emergency access. This excludes other forms of vehicular access. The wording of the modified policy could be interpreted to imply that the emergency access can only be taken from the north. This might be compounded by the modified supporting text relating to trees and hedgerows, which again implies that the emergency access would be from the north. There is a potential lack of clarity.
94. As a result, I have amended the wording of the proposed main modifications. This removes a specific reference to the 'north' in policy and supporting text. While an emergency access would be necessary, it does not have to be from the north. The amendments would not change the intent of the policy to any significant degree, as there would still be a requirement for an emergency access. My amendment simply makes it clear that an emergency access would be required. It would not preclude a proposal including an emergency access from the north but would also not stop alternatives being considered.
95. Overall, I am satisfied that with main modifications **MM62-MM67** in place the Plan will provide an effective framework for considering development of H2.6.

#### Warminster Sites – General

96. Overall, Warminster is a suitable location for development which supports the WCS. The WHSAP identifies four sites that would provide 235 additional

dwellings. Subject to the recommended main modifications below, the Plan will provide an additional 135 dwellings. This level of development is unlikely to result in any severe cumulative problems in relation to transport or local infrastructure. This would leave a shortfall against the indicative requirement, but for the reasons given above, there is no requirement to allocate additional sites.

#### Warminster Sites - Specific

97. Land at the East of the Dene (H2.7) is subject to several constraints relating to heritage assets. The site lies in the setting of the Grade II Listed Bishopstrow House and the Bishopstrow Conservation Area. There are other listed buildings in the vicinity of the site that would be affected by development. Views from Battlesbury Camp hillfort could also be affected by development. The Council's Heritage Impact Assessment (HIA) indicates that the significance of Bishopstrow House comes both from its aesthetic and architectural value, but also the extensive designed landscape that pre-dates the current house and the existing estate assets. The HIA concludes that limited development to the north west of the site would avoid harm to heritage assets.
98. The policy would allow for development in the more sensitive parts of the site in terms of the setting of Bishopstrow House and Bishopstrow Home Farm. Whilst the latter is a non-designated heritage asset, it nevertheless contributes positively to the setting and significance of the main House. To provide access to the developable part of the site would require a new access off Boreham Road. This would include the loss of a significant stretch of an existing high wall that is important to the character of the street and setting of the conservation area. The access road would also need to run through the southern part of the site, potentially having a detrimental impact on the setting of heritage assets. Even if similar measures to those described for sites H2.4 and H2.6 were considered, I am not convinced that the inevitable change in character would not result in unacceptable harm.
99. There is likely therefore to be a significant cumulative impact on the setting of both designated and undesignated heritage assets in the area. In allocating a site there should be reasonable certainty that potential impacts will be acceptable or able to be mitigated. This level of comfort does not exist, and serious doubts remain over whether a form of development would be possible that would not have an unacceptable degree of impact on the character, appearance or significance of heritage assets. This would be contrary to the requirements of the NPPF.
100. Notwithstanding the need for housing, I am not convinced that the benefit of development would outweigh potential harm in this location. The allocation of this site is therefore unjustified and contrary to national policy and it should be removed from the Plan along with consequential changes made to housing numbers (**MM5, MM21, MM70**).
101. An alternative approach to the site was put forward through consultation on further main modifications. This suggested reducing the allocation to the area to the north west and taking a new access from The Dene. This would involve the demolition of existing garages. This is a significantly different proposal that was not part of the submitted Plan, nor was it before me at the hearings.

While the evidence of the HIA suggests development in the north west corner would not result in the same degree of harm to heritage assets, the suitability and delivery of the access has not been tested through examination.

102. Addressing this new evidence would require the re-opening of the hearings. Before this could take place, further consultation would be required. There is no guarantee that following this course of action, the allocation would be considered sound. The delays this would cause to the adoption of the Plan, and the associated uncertainty in relation to housing delivery, are not justified by the level of development proposed. A review of the Local Plan is also already underway and this provides an opportunity for the revised site to be considered.
103. Land at Bore Hill Farm (H2.8) is allocated for around 70 dwellings. The site sits in undulating open ground between existing dwellings and commercial uses. The supporting text identifies an extant permission for B1 uses, which the Council wish to see included as part of any mix on the site. This site is adjacent to an existing bio-digester. There have been complaints about the odour from this facility, but there is nothing to suggest that these have been upheld or result in persistent long-term harm to the living conditions of residents. Nevertheless, while there is a reasonable likelihood that a satisfactory form of development could be achieved, it will still be necessary for any application to be accompanied by appropriate noise, dust and odour assessments to inform design and layout. This requirement needs to be set out in policy to be effective. There are no other overriding constraints on the site. The site boundary does not reflect the full developable area and should be amended in the interests of accuracy. Main modifications **MM71-MM74** are therefore necessary to ensure the Plan is justified and effective.
104. Land at Boreham Road (H2.9) is allocated for around 30 dwellings. Planning permission was granted for housing on this site on appeal and thus the principle of development has been established. There is nothing to suggest that the circumstances have changed since permission was granted, such that the site is no longer suitable for development. The site is near the Bishopstrow Conservation Area and adjacent to a Grade II Listed mile marker. Neither of these factors are an impediment to the principle of allocating the site. Modifications are necessary however to highlight the importance of heritage assets. There is however no justification to elevate the requirement to move the mile marker into policy, as this has already taken place. This reference should be removed.
105. The site is therefore in a suitable location for development, but modifications **MM75-MM78** are necessary to ensure the Plan is effective and consistent with national policy about flooding and heritage.

#### Warminster Community Area Remainder

106. Land at Barters Farm (H2.10) is allocated for 35 dwellings. The site forms part of a nursery and garden centre and is well related to existing dwellings in the village. Development would involve land that has been previously used for commercial purposes and would not extend to the north beyond existing dwellings on Wood Lane. There would be a reasonable buffer between the site and ancient woodland to the north. An acceptable form of access could be



achieved through Cleyhill Gardens and development would not result in a severe impact on the local transport network. Although small, development here would have the potential to help support local services and facilities of this Large Village. It would also contribute to meeting the indicative requirement for the Warminster CA Remainder and consequently the WCS. This is an acceptable location for development.

107. The Plan currently provides very little explanation as to what the Council expects on this site. While decision makers could rely to an extent on the WCS and national policy, the Plan should nevertheless be clear about any specific requirements as identified by the evidence base. This includes scale, the location of any access, the expectation that walking and cycling routes will be improved, the requirement for existing mature landscaping to be retained and enhanced and that there may be archaeological remains on site that should be assessed. As noted elsewhere, the potential for impacts on bats also needs to be highlighted. None of these factors render the site unsuitable for development. However, to be effective and consistent with other parts of the Plan, the policy and supporting text need to reflect this and explain what will be required, both in terms of assessment and mitigation (**MM79–MM81**).

#### Chippenham Community Area Remainder

108. Land at The Street, Hullavington (H2.11) is allocated for around 50 dwellings. This site is also being pursued through the Hullavington Neighbourhood Plan. This is at Regulation 16 stage and is likely to be going to referendum. The Neighbourhood Plan identifies a larger area for more dwellings. It may have been the case that when preparation of the WHSAP started, the Hullavington Plan was not at an advanced stage. However, as with other locations, it is inevitable that over time there are changes in context that need to be considered. In this case, the development proposed in Hullavington is neither of a scale nor complexity which suggests the WHSAP need 'intervene'. This is particularly the case where the Neighbourhood Plan already seeks to allocate the site. There are apparent inconsistencies between the two plans that would only be likely to result in confusion. Altering the WHSAP to be consistent with the Neighbourhood Plan would be neither necessary nor appropriate.
109. Allocating a site in this location is not therefore justified, particularly when the WHSAP would essentially be duplicating what is already being proposed for the area. Such an approach would also be inconsistent with paragraph 185 of the NPPF. It would also be inconsistent with the Council's position on other sites and locations in the WHSAP. To be sound, the site should be deleted from the Plan and consequential amendments made to the housing numbers and supporting text (**MM5, MM21, MM82**). There is no reason why this modification should prejudice the delivery of planned primary school expansion, which is also identified as an objective of the emerging Neighbourhood Plan.
110. Land east of Farrells Field, Yatton Kenynell (H2.12), is allocated for around 30 dwellings. Yatton Kenynell is classed as a Large Village which contains a small number of local facilities and services. The principle of development in this location is acceptable.

111. The site lies relatively close to the edge of the Cotswolds AONB, which takes in much of the village. There would be some visible encroachment into the countryside, but this need not be unduly harmful to the landscape character of the area or the setting of the AONB. Development would be well related to the edge of the village but would also be well screened by existing boundary treatments. To be effective however, the requirement to retain these should be elevated into policy along with other specific requirements, including those relating to access, improvements to cycling and walking routes and general matters of flood risk.
112. A satisfactory form of access for the scale of development proposed would not be achievable through Farrells Field. As such, reference to this should not be included in either policy or supporting text. A suitable access can be achieved directly from the B4309. To ensure certainty, this should be reflected in policy. The supporting text refers to the retention of a woodland corridor along the western boundary of the site. This extends either side of a farm track that runs along the boundary. However, this track is outside the ownership of the developer and is unlikely to form part of the development. Including this area in the site is not therefore justified. Reference to retaining the woodland should be removed from the Plan, along with any consequential changes to the policies map. Main modifications **MM83-MM88** are therefore necessary in the interests of effectiveness and to ensure the Plan is justified.

#### Malmesbury Community Area Remainder

113. Land at Ridgeway Farm (H2.13) is identified for around 50 dwellings. The Crudwell Neighbourhood Plan is in preparation, though had not reached Regulation 16 stage at the time of the WHSAP. Indicative requirements for the Malmesbury CA Remainder can largely be met without WHSAP allocations and thus there is no strategic imperative or necessity for the WHSAP to make strategic allocations in this Large Village. Moreover, the emerging Neighbourhood Plan has been consulted on and is at a stage where I am persuaded there is a clear commitment to progress the Neighbourhood Plan to referendum. There is also a clear intention for the Plan to include housing sites that will be capable of addressing local needs for the village. In these circumstances, the retention of the site would conflict with paragraph 185 of the Framework, which aims to give communities direct power to deliver the sustainable development they need. Accordingly, to be consistent with national policy, and with the Council's general approach to site selection, this site should be deleted and consequential changes made to housing numbers (**MM3, MM5, MM89**).

#### Westbury Community Remainder

114. Court Orchard/Cassways, Bratton (H2.14) is allocated for around 40 dwellings. A Neighbourhood Plan for Bratton was at the early stages of preparation at the time of the hearings. Unlike some others referred to, this Plan was not yet at a stage where it is clear whether it will progress toward referendum or whether it will allocate sites to meet local needs. As such, there is insufficient certainty or clarity about the Neighbourhood Plan to conclude that the allocation should be deleted. Scope exists for the WHSAP to 'intervene' in helping to meet the indicative needs of the CA remainder. In light of the

options considered, it is not unreasonable for the WHSAP to consider development in this Large Village.

115. The site is an open field on the edge of the village. It slopes steeply to the north and directly abuts housing fronting Westbury Road, Court Orchard and Rosenheim Rise. There is also housing directly opposite Westbury Road. While there would be some inevitable encroachment into the open countryside, development would not extend significantly beyond current built extent to the west. Development is likely to have some impact on the edge of the settlement, but with appropriate landscaping, design and layout, there is no reason to conclude that development would be unacceptably harmful to wider landscape character. In this regard, the supporting text refers to new woodland planting. Extensive woodland does not form part of the existing character of the area and thus there is no need to be this specific. Nevertheless, a new policy for the site should highlight the need for sensitive treatment of the edge of the village.
116. There is no clear evidence to suggest a safe and suitable form of access cannot be taken from the B0398. The anticipated increase in traffic should also not have an unacceptable impact on the local road network. The site is close to the Bratton Conservation Area and the Bratton Camp Scheduled Monument. There is no reason in principle why development should result in unacceptable harm to these heritage assets.
117. In the context of the character of the area, the Council has reassessed the site's capacity and concluded that 40 dwellings would result in too high a density. I agree that a figure of around 35 dwellings would allow for a more sensitive form of development. To ensure the policy is justified and effective, this figure should be used, with consequential amendments to the housing numbers (**MM6**). Although acceptable in principle, main modifications **MM90-MM95** are necessary to ensure the Plan is justified and effective. The Council consulted on a change to the boundary of the site as an additional modification. There is no evidence before me to conclude that change is necessary to make the Plan sound, and thus I have not recommended it as such.

### South Wiltshire HMA

#### Salisbury Sites – General

118. Salisbury is identified as a Principal Settlement in the WCS and a focus for strategic growth. Considering the indicative requirement for the area, the level of growth anticipated and the overall supply provision in the SW HMA, seeking to increase housing delivery in this location is wholly consistent with the WCS. There is no clear evidence to suggest that all such needs could be met without additional greenfield development on the edge of the urban area.

#### Salisbury Sites - Specifics

119. Land at Netherhampton Road (H3.1) is allocated for around 640 dwellings, employment uses, a local centre, land for a two-form primary school and space for a country park. The allocation would extend the built form along Netherhampton Road into the open countryside. Nevertheless, the site is well related to the edge of Harnham and a main route into Salisbury itself. It is

adjacent to an industrial estate, which has recently had planning permission for residential development. The site was considered in relation to the WCS and was identified as a potential reserve site. It is in a suitable location to support the WCS spatial strategy.

120. While the development would significantly alter the urban edge, such impacts are an inevitable consequence of seeking to meet large housing needs in the area. The development would lead to additional pressures on roads and other local infrastructure, including schools, but as noted elsewhere this should not result in severe problems. The site is beyond a reasonable walking distance to most day-to-day facilities, but the provision of a primary school and local centre would provide some scope to reduce journeys over time. There is a bus stop some 600 metres from the site, which would provide some opportunities for public transport use. The scale of development is such that there may be opportunities for public transport to access the site directly once a critical mass has been established. Nevertheless, a development of this scale would inevitably lead to increased car use. However, the relative proximity of Salisbury and associated services, facilities and employment should help to ensure trip lengths are not unduly lengthy.
121. The requirements in relation to land for a primary school and country park are justified. There has been some criticism that a school in this location would generate additional traffic and additional journey lengths, particularly when considering the location of other development in Salisbury. However, there is logic in locating a primary school in proximity to the significant residential development envisaged on sites H3.1 and H3.3. This will reduce the need to travel from these sites and help offset any potential trip generation to the site from other developments elsewhere.
122. The policy is vague on the scale or type of employment land that may be required, with the supporting text suggesting this is something that could be addressed at the application stage. The evidence supporting the requirement for employment land on this site is not strong. Part of the justification is that the site would provide a possible location for business uses to decant from the Churchfields site allocated in the WCS. However, the Council has not identified a definitive amount of land or floorspace that would be needed. To leave this to the application stage would cause an unacceptable lack of clarity for developers trying to prepare a scheme. Furthermore, the Council has recently granted permission for the loss of employment land on the neighbouring site, which does not suggest strong evidence of demand. The lack of clear evidence supporting the need or guidance for employment uses leads me to conclude it is neither justified nor effective. There is also no evidence that would inform a main modification to provide clearer guidance. Accordingly, this element of policy should be deleted. There is nothing to suggest this would have any impact on the Council's employment land supply or strategy.
123. The policy requires provision of a local centre, but what this means in practice is not explained. While some on-site facilities on a site of this size are justified, the policy should provide some guidance about what would be expected. There is a lack of clarity about healthcare requirements, particularly in terms of whether additional provision is needed on site or whether off-site provision is acceptable. There is nothing to suggest the policy is seeking contributions

to healthcare over and above 'normal' contributions as required by the WCS, but equally there is no reason why this could not be provided on site. Modifications are needed to make it clear that contributions will be required in line with the WCS and could be used on- or off-site. This should provide a degree of comfort for developers and some flexibility in how needs are addressed.

124. As the site is in a sensitive location, the policy should also include more clarity over access arrangements and issues relating to design and layout. Restricting development to below the 75-metre contour will provide reasonable protection for nearby heritage assets, including Salisbury Cathedral, Old Sarum and Netherhampton Church. This will be supplemented by significant amounts of open space provision. Adequate protection of the Harnham Chalk Pit SSSI, Harnham Slope Country Wildlife Site and the River Avon SAC can be achieved, though modifications to policy and/or supporting text are necessary to ensure requirements are clear.
125. In conclusion, the allocation is in a relatively accessible location and, while it will have a significant impact on the character of the area, such change can take place without unacceptable harm. The site would provide a substantial number of new dwellings that will help bolster the supply of housing land in the area and go a substantial way to meeting the indicative requirements for Salisbury. Modifications **MM98-MM104** are necessary to ensure the policy provides a clear, comprehensive and effective policy, which is justified by the evidence. Consequential changes to supporting text to provide clarity will also be necessary.
126. Land at Hilltop (H3.2) is a small greenfield site on the edge of the settlement. Planning permission has already been granted and thus the principle of development has been established. The site is currently a vacant and overgrown plot that detracts from the character of the residential area. Development would relate well to the existing residential area and is suitably located for a small scheme. Although only for 10 dwellings, the development would still help to contribute to the overall strategic requirement for Salisbury without resulting in any unacceptable impacts.
127. There are still particular requirements which ought to be set out in policy. This includes addressing issues relating to the translocation of slow worms referenced in the supporting text. There appears to be ample scope to address this issue in the neighbouring country park or on other adjacent land. Such issues were considered in relation to the permitted scheme and not deemed prejudicial. The site is located on the brow of a hill and thus some care would be needed in relation to the scale of dwellings. The policy should make reference to this. However, there is no reason in principle why development here should be harmful to heritage assets. Main modifications are therefore necessary to ensure effectiveness (**MM105 & MM106**).
128. Land north of Netherhampton Road (H3.3) has been identified for around 100 dwellings. This would add to the westward growth of Harnham, but new houses would be well related to existing residential development to the east. It would also be well related to development associated with site H3.1 and could make use of any facilities that are included in that development. It is therefore an appropriate location for growth.

129. There are clear sensitivities associated with the setting of the Cathedral in this location. To be effective, the Plan should establish what measures will be expected to minimize impacts. This includes the provision of an open corridor to protect views of the Cathedral Spire, setting development back from the road and ensuring boundary treatments, landscaping and paraphernalia such as lighting and signage are properly considered. While some urbanisation of the Cathedral's setting is inevitable, there is ample scope within the site to ensure a sensitive form of development could come forward that need not result in undue harm.
130. The evidence also highlights the potential for archaeological finds on the site. This is not currently adequately addressed in the Plan and thus modifications are necessary to highlight this issue and what the Council will expect from proposals.
131. There are no other issues that would lead me to conclude the allocation of the site is not sound. Matters highlighted already in relation to the River Avon SAC, drainage, highways and other infrastructure can be resolved through the planning application process. Main modifications are therefore necessary to ensure the Plan is effective, but otherwise the principle of development is sound (**MM107–MM111**).
132. Land at Rowbarrow (H3.4) is allocated for around 100 dwellings. It comprises open fields adjacent to an existing area of recent residential development. As an urban extension, the site would have relatively good access to services by public transport. Some facilities are also available in the adjacent estate, including a local convenience store. The site slopes from the existing dwellings to an existing woodland belt. However, concerns over the impact on local character and the setting of the Cathedral could be adequately dealt with by good quality design and layout which takes account of the topography. The site boundary includes an area of woodland, which would be outside the developable area. The policies map should therefore be amended to reflect this.
133. The site is in a suitable location for additional growth and, subject to appropriate layout and design, there are no constraints sufficient to render the site unsuitable in principle. Main modifications **MM112–MM116** are necessary to ensure the policy framework for the site will be effective.
134. The Council proposed a modification to the Plan to include an additional site known as 'The Yard'. This came to light at the Regulation 19 consultation stage and was assessed in the same way as all other suggested sites. On this basis, the Council sought to include the site subsequent to the submission of the Plan. Planning permission already exists for the development. Not including this site in the Plan where the Council has accepted it is consistent with their site selection criteria would result in an inconsistent approach and would not be justified. I therefore consider that the site should be included, and a new allocation and policy created. As well as scale and access, the new policy should reflect the need for biodiversity issues relating to slow worms and barn owls to be considered in any proposal. There is no evidence to suggest either of these should be an impediment to development. Based on the evidence provided, excluding this site would not be justified. To be sound, the Plan should be modified to include the site as an allocation, with

consequential amendments to the housing numbers (**MM7, MM96, MM117-MM119**).

Amesbury, Bulford and Durrington

135. Land at Clover Lane, Durrington (H3.5) is allocated for around 45 dwellings. Permission already exists for 15 dwellings on the site. Durrington is identified in the WCS as a potential location for growth and there is a residual indicative need in the CA which this development would help to meet. The site takes up a long rectangular plot parallel to an allotment and a large recently built estate. This is a suitable location for a relatively small area of additional growth. Access would be taken from two points on Clover Lane. This would be acceptable from a transport perspective and would not have an unacceptable impact on the living conditions of existing residents.
136. The site is adjacent to the Durrington Conservation Area. With sensitive design and layout, there is no reason in principle why development should result in unacceptable harm to these assets. The supporting text sets out measures relating to the retention of trees and hedgerow bordering the site and improving links to High Street. These are justified requirements that for effectiveness should be included in a specific policy for the site. The site boundary does not reflect the full developable area and is not justified. The policies map should be amended to ensure accuracy and clarity. Main modifications **MM122-MM126** are necessary to ensure the Plan provides an effective framework for determining applications.
137. Land at Larkhill Road, Durrington (H3.6) is allocated for around 15 dwellings. The site wraps around and to the rear of an existing dwelling and to the rear of a veterinary practice. Although the site currently breaks up a largely continuous built-up frontage, infill development here need not have a significant impact on the character or appearance of the area. This part of Durrington is relatively close to the World Heritage Site, including Durrington Walls and Woodhenge. Development will therefore need to be subject to precautionary archaeological assessment. However, there is no reason why this should render development unacceptable in principle. These constraints should be reflected in both policy and supporting text. To be effective, main modifications are necessary to make it clear what will be expected in terms of scale, layout and design (**MM127-MM129**).
138. Subject to the main modifications outlined above, I am satisfied that the allocated sites are justified, effective and consistent with national policy.

**Issue 3 – Are the proposed settlement boundaries justified, effective and consistent with national policy?**

139. The Council has undertaken a thorough review of established settlement boundaries. This has been based on the methodology set out in Topic Paper 1: Settlement Boundary Review Methodology (TOP.01). The methodology used is logical, justified and soundly based.
140. The purpose of the settlement boundary is to illustrate the extent of the built form of the settlement. Allocations have been excluded at this stage. This is not an unreasonable approach. Allocations on the edge of settlements will inevitably include land which does not form part of the development.

Examples of this might be areas of public open space or landscape buffers. To include the whole of an allocation in advance of it coming forward would potentially include areas that would not normally be considered suitable for development under WCS policy. Over time, this could have the unintended consequence of establishing a principle in favour of development on land that was intended to act as mitigation for development delivered through the allocation. As settlement boundaries are subject to regular review, it is appropriate to wait until development is underway or complete to be able to fully ascertain where the extent of the built form lies.

141. WCS Core Policy 2 states that, subject to certain exceptions, development will not be permitted outside defined settlement boundaries. However, it cannot be reasonably asserted that this restriction would apply to sites allocated for development in an up-to-date development plan. As a result, excluding housing or employment allocations from settlement boundaries does not result in any uncertainty about whether development could proceed. The allocation establishes the principle of development and provides a greater degree of certainty about what will be expected than a generic 'windfall' policy. Excluding unimplemented allocations from settlements does not therefore prejudice developers' interests in any way.
142. Similarly, the extent of a planning permission does not always reflect the resulting built form. Using the 'redline' of an application may not lead to a suitable or consistent outcome in relation to settlement boundaries. If the settlement boundary were based on a permission that subsequently expired, then the revised settlement boundary also may not be appropriate. The context within which permissions are granted and the 'planning balance', can also change over time. If a permission expires, it is entirely appropriate for the Council to be able to reassess whether a new application would be successful. Including all unimplemented permissions within settlement boundaries would remove the Council's ability to assess this.
143. Being outside the settlement boundary would clearly not stop a scheme with planning permission being implemented. Should a new application be considered on the same site, then presumably the Council would take account of the planning history as a material consideration alongside any other relevant material considerations. Developers with extant permissions would therefore suffer no prejudice.
144. There is inevitably a degree of judgement as to where boundary lines should be drawn. These are judgements the Council is entitled to make. I am satisfied therefore that the process they have gone through is robust and judgements made are sound. There will always be some disagreement over where the line should be drawn, but these are not sufficient to render the Council's approach or conclusions unsound in principle.
145. As noted elsewhere, the policies map is not defined in statute as a development plan document and so I do not have the power to recommend modifications to it. However, to be consistent with the Plan's objectives and to ensure the development plan as a whole is effective, then changes to settlement boundaries proposed through this review as identified in EXAM.01 and WHSAP.03.02-46 and Appendix 1 of the Schedule of Further Main Modifications should be made.



146. In conclusion on this issue, I am satisfied that the proposed settlement boundaries are justified, effective and consistent with national policy.

## **Assessment of Legal Compliance**

147. Other than in respect of the timetable for the examination and adoption of the Plan, the WHSAP has been prepared in accordance with the Council's Local Development Scheme (LDS) as updated in April 2019. There are no legal compliance failures in this regard.

148. The Council's Statement of Community Involvement (SCI) (SCI.01) was published in July 2015. I recognise that consultation in the Plan, which has taken place over several stages, has been for some people somewhat confusing and has included large amounts of technical and background evidence. Nevertheless, I am satisfied that each stage of consultation has been carried out in accordance with the SCI. This includes the focussed consultation of the Schedule of Proposed Changes and consultation on further main modifications.

149. There is a requirement in section 19(5) of the 2004 Act for local authorities to carry out Sustainability Appraisal (SA) as part of the preparation of a local plan. This is a systematic approach to identify, decide and evaluate the likely significant effects of the Plan and reasonable alternatives in order to promote sustainable development. The NPPF states that SAs should be proportionate and the process is an iterative one.

150. The main SA Report was produced in May 2018 and there have been subsequent revisions and addenda to consider the effects of the Schedule of Proposed Changes (WHSAP.03) and the effects of the further main modifications. The SA identified 12 SA objectives against which proposals were assessed. These are appropriate to the scope of the Plan, local context and national policy. Assessment of the Plan against objectives was undertaken by experienced assessors, with input from Council officers. I am satisfied the overall approach has been adequate.

151. There have been regular complaints throughout the examination about the accuracy or consistency of the scoring undertaken for individual sites. Disputes about such findings are nevertheless to be expected. These are often due to differences in planning opinion and do not undermine the SA process undertaken. Furthermore, the SA is not the only basis on which allocations have been made. The SA allows a range of considerations affecting sites to be assessed in a coherent way but does not remove the need for the exercise of judgement by the Council.

152. It has been argued that the SA is inadequate because it did not consider all reasonable options. This primarily relates to the initial sifting of sites. It is argued that the sites 'excluded' at an early stage should have been informed by the SA process. In the context of the WHSAP being a follow-up subordinate plan to the WCS, it is not unreasonable for the Council to have limited the scope of the site selection exercise. Sites rejected at Stages 1 and 2 of the Site Selection process were not considered to be 'reasonable alternatives' for the WHSAP to consider. As such, there is logic in them not having been considered through the SA and the SA is not flawed in this regard.

153. There has also been criticism of the methodology of assessing sites as 'more' or 'less' sustainable. Sites considered 'more' sustainable were generally taken forward for further assessment. Whether or not a site was considered more or less sustainable was based on a judgement. While it has been suggested this was arbitrary, there will always be elements of judgement in determining which sites should be taken forward for further consideration. This is part of the iterative process that is inherent in the SA and site selection process. There is nothing in this that would lead me to conclude the SA was inadequate in its approach. Again, this was not the only measure by which sites were considered. The whole of the evidence base was taken into account in deciding what sites to take forward for more detailed analysis and what to allocate. This also includes judgements about balancing any impacts and the benefits associated with development coming forward.
154. Overall, I am satisfied that the SA has sufficiently evaluated the reasonable alternatives and is suitably comprehensive, satisfactory and legally compliant.
155. The Habitat Regulations Assessment (HRA), as supplemented by revisions and addenda to consider modifications, conclude that the WHSAP would not be likely to have an adverse effect on the integrity of any European Designated site (HRA.01/02/02a/03). This included Appropriate Assessment of likely significant effects on Salisbury Plain SPA, BBAB-SAC and the River Avon SAC. This took into account recreational pressures, phosphates, water abstraction and potential habitat loss and deterioration. Reasonable and realistic mitigation measures have been identified, as referred to in the discussion of the main issues. Where necessary, these have been identified in the Plan and/or have been recommended for inclusion through main modifications. I am satisfied therefore that the HRA meets the relevant statutory requirements.
156. The Plan seeks to identify sites in locations well related to existing settlements. This should reduce the distance travelled to meet everyday needs. It also maximises opportunities to access services by means other than the car and seeks to bolster the vitality of rural communities in some cases. All site specific policies highlight the need and importance of addressing any potential flood risk. Where practical, they also seek to improve transport links, including walking and cycling. The WHSAP also forms part of the development plan as a whole for Wiltshire and all proposals will be considered against policies within it. Overall, in relation to those matters within the scope of the WHSAP, there are policies designed to ensure that the development and use of land contribute to the mitigation of, and adaptation to, climate change.
157. The WHSAP complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.
158. In reaching the conclusion above, I have had due regard to the Public Sector Equality Duty contained in the Equality Act 2010. I do not consider that my findings will impact negatively on anyone with a relevant protected characteristic in respect of the matters identified by section 149 of the Act, neither will any part of the Plan be a barrier to providing for inclusive design and accessible environments as required by the NPPF.

## **Overall Conclusion and Recommendation**

159. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

160. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Wiltshire Housing Site Allocation Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*S J Lee*

**Inspector**

This report is accompanied by an Appendix containing the Main Modifications.

**Appendix 1: Wiltshire Housing Site Allocations Plan (WHSAP)**  
**Consolidated Schedule of Recommended Main Modifications (December 2019)**

The Main Modifications are set out in plan order. The paragraph numbers and policy references refer to the Submission version of the Wiltshire Housing Sites Allocations Plan (WHSAP) (July 2018) (WHSAP.01) and do not take account of any deletions or additions contained within these modifications. Changes to text are expressed in the conventional form of either ~~strike through~~ for deletions and underlining for additions of text. Policy wording is shown in **bold**.

Main Modification (MM) ref number	Submission Draft Plan reference	Reference Number of Proposed Change (PC) or Further Main Modification (FMM)	Main Modification												
MM1	Paragraph 1.1	FMM 1	<p>Insert the following text immediately after paragraph 1.1:</p> <p><u>The policies of this Plan are strategic in nature. As a whole, the Plan supports the delivery of the Wiltshire Core Strategy. Therefore, the site allocations in this Plan will support the delivery of housing to meet strategic needs. However, as anticipated by Core Policy 2 of the Wiltshire Core Strategy, there remains a role for parish and town councils in bringing forward neighbourhood plans to deliver non-strategic allocations to support housing supply.</u></p>												
MM2	Table 4.2	PC 7	Delete: <del>Market Lavington.</del>												
MM3	Table 4.3	PC 9	Delete: <del>Malmesbury Community Area Remainder</del>												
MM4	Table 4.4	PC 11	<p>Delete text referring to allocations at Market Lavington:</p> <table border="1"> <tr> <td rowspan="3">Market Lavington</td> <td>1089</td> <td>Southcliffe</td> <td>15</td> </tr> <tr> <td>2055 / 530</td> <td>Underhill Nursery</td> <td>50</td> </tr> <tr> <td>3443</td> <td>East of Lavington School</td> <td>15</td> </tr> </table>	Market Lavington	1089	Southcliffe	15	2055 / 530	Underhill Nursery	50	3443	East of Lavington School	15		
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MM5	Table 4.5	PC 12	<p>Delete text and footnote referring to allocations at Warminster, Hullavington and Crudwell:</p> <table border="1"> <tr> <td>Warminster</td> <td>603</td> <td>East of the Dene</td> <td>100</td> </tr> <tr> <td>Hullavington</td> <td>690</td> <td>The Street</td> <td>50</td> </tr> <tr> <td>Crudwell</td> <td>3233</td> <td>Ridgeway Farm</td> <td>-50<sup>43</sup></td> </tr> </table>	Warminster	603	East of the Dene	100	Hullavington	690	The Street	50	Crudwell	3233	Ridgeway Farm	-50 <sup>43</sup>
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			<sup>43</sup> This total includes 10 dwellings that already have planning permission																				
MM6	Table 4.5	PC 13	<p>Update housing numbers as follows:</p> <table border="1"> <tr> <td>Trowbridge</td> <td>613</td> <td>Elm Grove Farm</td> <td><del>200</del> <u>250</u></td> </tr> <tr> <td>Trowbridge</td> <td>3260</td> <td>Upper Studley</td> <td><del>20</del> <u>45</u></td> </tr> <tr> <td>Trowbridge</td> <td>298</td> <td>Land off the A363 at White Horse Business Park</td> <td><del>150</del> <u>175</u></td> </tr> <tr> <td>Trowbridge</td> <td><del>297/</del> 263</td> <td>Elizabeth Way</td> <td><del>205</del> <u>355</u></td> </tr> <tr> <td>Bratton</td> <td>321</td> <td>Court Orchard / Cassways</td> <td><del>40</del> <u>35</u></td> </tr> </table>	Trowbridge	613	Elm Grove Farm	<del>200</del> <u>250</u>	Trowbridge	3260	Upper Studley	<del>20</del> <u>45</u>	Trowbridge	298	Land off the A363 at White Horse Business Park	<del>150</del> <u>175</u>	Trowbridge	<del>297/</del> 263	Elizabeth Way	<del>205</del> <u>355</u>	Bratton	321	Court Orchard / Cassways	<del>40</del> <u>35</u>
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MM7	Table 4.6	PC 14	<p>Insert new row indicating the proposed new allocation at Salisbury:</p> <table border="1"> <tr> <td>Salisbury</td> <td><del>OM00</del> <u>3</u></td> <td>The Yard</td> <td><del>14</del></td> </tr> </table>	Salisbury	<del>OM00</del> <u>3</u>	The Yard	<del>14</del>																
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MM8	Paragraph 4.52	PC 25	<p>Amend the paragraph to read:</p> <p>Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately <del>800</del> <u>1,050</u> dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around <del>4,220</del> <u>1,297</u>.</p>																				
MM9	Para 5.4	PC 33 and PC 34	Amend paragraph, from third sentence, to read:																				

			<p>Most sites proposed are of more than one hectare, <u>and will therefore require a flood risk assessment (incorporating an assessment of the predicted effects of climate change) in order to ensure that there is no increase in risk of flooding on site and elsewhere, and will need to comply thereby complying with Core Policy 67 (Flood Risk) with regard to flood risk and national policy. In addition, sites proposed within Source Protection Zones (SPZ) 1 and 2 will need to comply with Core Policy 68 (Water Resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy. Consideration should be given to the predicted effects of climate change and proposals should allocate appropriate buffer strips where there is no adjacent built development. Natural flood management should be incorporated into planning proposals to mitigate new and existing developments.</u></p>
MM10	Add new paragraph after Paragraph 5.4	PC35	<p>Insert new paragraph to read:</p> <p><u>The Environment Agency and Natural England advise that all development within the River Avon catchment should be 'phosphate neutral' for an interim period until 2025. Beyond this time an approach will take account of water company planning, as well as latest Government policy and legislation. This is to guard against a further worsening of the condition of the River Avon Special Area of Conservation (SAC). An annex of the Nutrient Management Plan will explain measures to help deliver phosphate neutral development and how they will be delivered. Some measures are capable of being delivered as a part of housing development. Off-site measures are supported by Community Infrastructure Levy and there is also scope to improve the efficiency of sewage treatment works. The definition of 'phosphate neutral' is the additional phosphorus load generated by new development after controls at source, reduction by treatment and/or off-setting measures leading to no net increase in the total phosphorus load discharged to the River Avon SAC.</u></p>
MM11	Paragraph 5.11	PC 37	<p>Amend paragraph 5.11 to read:</p> <p>As appropriate, additional evidence will need to be prepared at a level of detail to support a planning application. Such new evidence can be used as a material consideration when considering a specific planning application. In many cases, particularly important items are referred to for each allocation. Such evidence may include, but is not limited to a Landscape and Visual Impact Assessment, <del>site specific</del> <u>Heritage Impact Assessment</u>, Biodiversity Report, Surface Water Management Plan (<u>incorporating a site wide, comprehensive drainage strategy</u>), Flood Risk Assessment (<u>incorporating an assessment of the predicted effects of climate change</u>), and Transport Statement.</p>
MM12	Policy H1, Table 5.2, Paragraph 5.13	PC 32 & PC 38 and FMM 2	<p>Amend title in third column in Table 5.2 as follows:</p> <p><del>No of dwellings</del> <u>Approximate number of dwellings</u></p>

			<p>Amend table 5.2 to remove reference to allocations at Market Lavington.</p> <p>Delete the title 'Policy H1' and the shaded text box but retain the rest of the information as supporting text as part of paragraph 5.13, as follows:</p> <p>Paragraph 5.13 – Land for housing development is identified to support the role of settlements in the East Wiltshire HMA, to ensure supply, improve choice and competition in the market for land. <u>The following site is allocated for development, as shown on the Policies Map:</u></p> <p><b>Policy H1</b>  <del>Land is allocated for residential development at the following sites, as shown on the policies map:</del>  Table 5.2 <u>Housing Allocation in the East Wiltshire Housing Market Area</u></p> <table border="1" data-bbox="795 600 1738 1067"> <thead> <tr> <th>Community Area</th> <th>Reference</th> <th>Site Name</th> <th><u>Approximate number</u> <del>No</del> of dwellings</th> </tr> </thead> <tbody> <tr> <td>Tidworth</td> <td>H1.1</td> <td>Empress Way, Ludgershall</td> <td>270</td> </tr> <tr> <td rowspan="3">Devizes</td> <td>H1.2</td> <td>Underhill Nursery, Market Lavington</td> <td>50</td> </tr> <tr> <td>H1.3</td> <td>Southcliffe, Market Lavington</td> <td>45</td> </tr> <tr> <td>H1.4</td> <td>East of Lavington School, Market Lavington</td> <td>45</td> </tr> </tbody> </table>	Community Area	Reference	Site Name	<u>Approximate number</u> <del>No</del> of dwellings	Tidworth	H1.1	Empress Way, Ludgershall	270	Devizes	H1.2	Underhill Nursery, Market Lavington	50	H1.3	Southcliffe, Market Lavington	45	H1.4	East of Lavington School, Market Lavington	45
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	H1.4	East of Lavington School, Market Lavington	45																		
MM13	Policy H1.1	PCs 40, 41, 42, 43, 44 and FMM 3	<p>Amend policy H1.1 as follows:</p> <p><b>Land at Empress Way, as identified on the Policies Map, is <del>proposed</del> <u>allocated</u> for mixed-use development comprising the following elements:</b></p> <ul style="list-style-type: none"> <li>• approximately 270 dwellings;</li> <li>• <del>a connecting highways link between</del> <u>vehicular access from</u> Empress Way and Simonds Road/New Drove, <del>via the adjoining development at the former Granby Gardens site via the</del></li> </ul>																		



			<p><u>Granby Gardens development site, together with a connecting highways link between the two points of access;</u></p> <ul style="list-style-type: none"> <li>• <u>1.8ha of land reserved for a two-form entry primary school in the south-eastern corner of the site; and</u></li> <li>• <del>A strong landscape framework including significant screening to the southern and eastern boundaries of the site.</del></li> <li>• <u>improvements to cycling and walking routes through the site to link into the existing network, including the retention and enhancement of public rights of way LUDG1 and LUDG2.</u></li> </ul> <p><u>Development proposals will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> <li>• <u>a planning obligation to safeguard land for a primary school for an agreed period of time;</u></li> <li>• <u>a transport assessment that will determine the trigger point for the delivery of the access via Simonds Road and inform detailed measures to mitigate impacts on the local road network;</u></li> <li>• <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site;</u></li> <li>• <u>layout and design of the development will be expected to take particular care to ensure that a suitable boundary with the open countryside is provided; and</u></li> <li>• <u>layout of the development will be informed by an odour assessment, to be undertaken in consultation with Southern Water to ensure a satisfactory living environment will be created.</u></li> </ul> <p><u>Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements and opportunities, delivered to achieve the comprehensive development of the site, including the timely and coordinated provision of necessary infrastructure.</u></p>
MM14	Paragraph 5.19	PC41	<p>Amend last sentence of paragraph 5.19 to read:</p> <p>Transport assessment will <u>determine the trigger point for the delivery of the access via Simonds Road and</u> inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge.</p>

MM15	Paragraph 5.20	PC 42 and FMM 4	<p>Amend paragraph 5.20 as follows:</p> <p>Development of the site will include 1.8ha reserved for a two-form entry primary school. Based on current estimates, <u>capacity within local primary schools capacity</u> will be absorbed by committed development elsewhere in the town. The need to retain the reserved land for a school will be determined as part of the application process based on <del>demand</del> <u>an assessment of future need for primary school places at the time of an application at that time</u>. In the event that land for a school is not required within a period to be <u>agreed with Wiltshire Council's Education Department</u>, then the land will be returned and thereby revert to <u>agricultural use</u>. Responsibility for provision of the school will lie with the Council and the process and <u>timescale for delivery will be in agreement with the developer</u>. The development will also be subject to the <u>normal contributions to education provision in accordance with core policies of the Wiltshire Core Strategy</u>.</p>
MM16	Paragraph 5.21	PC 40 and PC44	<p>Amend paragraph to read:</p> <p>The site design will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site as there are middle and long-distance views of the site from the south. The final design and layout should be informed by a Landscape and Visual Impact Assessment. <u>Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy</u>. Development will provide a connection to the nearest point of adequate capacity in the <u>sewerage network, as advised by the service provider</u>. Development layout should be informed by an <u>odour assessment, to be undertaken in consultation with Southern Water</u>.</p>
MM17	Section titled 'Devizes Community Area Remainder'	PC45	Delete section title ' <del>Devizes Community Area Remainder</del> ' and delete paragraphs 5.22 – 5.24.
MM18	Housing Allocation H1.2	PC46	<p>Delete section title '<del>H1.2 Underhill Nursery, Market Lavington</del>'.</p> <p>Delete site boundary map at Figure 5.2.</p> <p>Delete paragraphs 5.25 to 5.33.</p>
MM19	Housing Allocation H1.3	PC47	<p>Delete section title '<del>H1.3 Southcliffe, Market Lavington</del>'.</p> <p>Delete site boundary map at Figure 5.3.</p>

			Delete paragraphs 5.34 to 5.35.											
MM20	Housing Allocation H1.4	PC48	Delete section titled ' <del>H1.4 East of Lavington School, Market Lavington</del> '.  Delete site boundary map at Figure 5.4.  Delete paragraphs 5.36 to 5.37.											
MM21	Policy H2 Table 5.3  Paragraph 5.40	PC 32, PC 51 (which also relates to PC55, PC60, PC64, PC70, PC94, PC92, PC93) and FMM 5.	Amend title in third column in Table 5.3 as follows:  <del>No of dwellings</del> <u>Approximate number of dwellings</u>  Amend table 5.3 to amend number of dwellings proposed, and to reflect the removal of the allocations at Crudwell, East of the Dene, Warminster and Hullavington.  Delete the title 'Policy H2' and the shaded text box but retain the rest of the information as supporting text as part of paragraph 5.40, as follows:  Other allocations are made at Warminster, a Market Town, to support its role and at designated Large Villages in the rural parts of Chippenham, <del>Malmesbury</del> and Westbury Community Areas geared to support local needs in accordance with WCS Core Policy 2. <u>The following sites are allocated for development, as shown on the policies map:</u>  <u>Policy H2</u> <del>Land is allocated for residential development at the following sites, as shown on the policies map:</del> Table 5.3 <u>Housing Allocations in the North and West Wiltshire Housing Market Area</u>											
			<table border="1"> <thead> <tr> <th>Community Area</th> <th>Reference</th> <th>Site Name</th> <th><u>Approximate number</u> <del>No of dwellings</del></th> </tr> </thead> <tbody> <tr> <td rowspan="2">Trowbridge</td> <td>H2.1</td> <td>Elm Grove Farm, Trowbridge</td> <td><del>200</del><u>250</u></td> </tr> <tr> <td>H2.2</td> <td>Land off the A363 at White Horse</td> <td><del>450</del><u>175</u></td> </tr> </tbody> </table>	Community Area	Reference	Site Name	<u>Approximate number</u> <del>No of dwellings</del>	Trowbridge	H2.1	Elm Grove Farm, Trowbridge	<del>200</del> <u>250</u>	H2.2	Land off the A363 at White Horse	<del>450</del> <u>175</u>
Community Area	Reference	Site Name	<u>Approximate number</u> <del>No of dwellings</del>											
Trowbridge	H2.1	Elm Grove Farm, Trowbridge	<del>200</del> <u>250</u>											
	H2.2	Land off the A363 at White Horse	<del>450</del> <u>175</u>											

					Business Park, Trowbridge		
				H2.3	Elizabeth Way, Trowbridge	<del>205</del> <u>355</u>	
				H2.4	Church Lane, Trowbridge	45	
				H2.5	Upper Studley, Trowbridge	<del>20</del> <u>45</u>	
				H2.6	Southwick Court, Trowbridge	180	
			Warminster	<del>H2.7</del>	<del>East of the Dene, Warminster</del>	400	
				<del>H2.8</del> <u>H2.7</u>	Bore Hill Farm, Warminster	70	
				<del>H2.9</del> <u>H2.8</u>	Boreham Road	30	
				<del>H2.10</del> <u>H2.9</u>	Barthers Farm Nurseries, Chapmanslade	35	
			Chippenham	<del>H2.11</del> <u>H2.4</u> <u>0</u>	<del>The Street, Hullavington</del>	50	
				<del>H2.12</del> <u>H2.1</u> <u>1</u>	East of Farrells Field, Yatton Keynell	30	
			Malmesbury	H2.13	Ridgeway Farm, Crudwell	50	

			<table border="1"> <tr> <td>Westbury</td> <td>H2.13H2.1 2</td> <td>Off B3098 adjacent to Court Orchard / Cassways, Bratton</td> <td>40-35</td> </tr> </table>	Westbury	H2.13H2.1 2	Off B3098 adjacent to Court Orchard / Cassways, Bratton	40-35
Westbury	H2.13H2.1 2	Off B3098 adjacent to Court Orchard / Cassways, Bratton	40-35				
MM22	Paragraph 5.44, first bullet point	FMM 6	<p>Amend supporting text as follows:</p> <p><b>Ecology:</b> an interconnected pattern of priority Biodiversity Action Plan (BAP) habitats such as mature hedgerows, trees and water features, along with designated woodland features around the town support significant populations of protected bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). Additional housing development will increase the population of the town and thereby amplify the risk of recreational pressure on bats. To address this issue, the Habitats Regulations Assessment (HRA) for the Plan recommends <del>developing</del> a strategy for managing recreational pressure across the town. <u>This states that core bat habitat should be retained and buffered to protect and enhance the local features, to be identified through appropriate survey, of each site.</u> Detailed design and layout of schemes <u>will be informed by survey work in accordance with the Trowbridge Bat Mitigation Strategy (TBMS) and</u> would need to consider additional planting and open space to protect and enhance <del>these</del> BAP priority habitats and thereby augment opportunities for bat foraging routes and roosting sites. <del>This could include</del> <u>ing</u> establishing dark corridors through sites <del>to protect foraging routes and roosting areas for bats.</del> Specific measures that will be required are explained for each site and funding contributions may also be sought towards <u>the delivery of potential offsite measures and monitoring, including new woodland planting and land acquisition to create a Suitable Alternative Natural Greenspace (SANG) to alleviate recreational pressure on core bat habitat, as defined</u> <del>to be contained</del> in the Trowbridge <u>Bat Recreation Management Mitigation Strategy.</u></p>				
MM23	Paragraph 5.44, second bullet point	FMM 7 and PC53 (superseded)	<p>Delete supporting text as follows:</p> <p><b>Education:</b> <del>development will increase the number of pupils needing primary school places. A local lack of capacity across the town affects proposals allocated for development. With the majority of proposed housing being directed south/south-west of the town, the evidence points directly to the need for a new primary school in this area. Therefore, in addition to land reserved for one new school, funding contributions will be sought from developers to help provide adequate capacity.</del></p>				
MM24	Policy H2.1	PC 55 & PC 56 and FMM 8	<p><b>Amend policy H2.1:</b></p> <p><b><del>Approximately 14.43ha of land at</del> Land at Elm Grove Farm, as identified on the Policies Map, is <del>proposed allocated</del> for mixed use development comprising the following elements:</b></p>				

			<ul style="list-style-type: none"> <li>• approximately <del>200</del> <u>250</u> dwellings;</li> <li>• <del>At least 1.8ha of land for a two form entry primary school along with playing pitches;</del></li> <li>• a multi-purpose community facility <u>co-located with existing or improved open space;</u></li> <li>• a <u>significantly improved and consolidated public open space area incorporating and augmenting the existing Queen Elizabeth II Field to provide a play area, junior level sports pitches and changing facilities for local community teams to utilise;</u></li> <li>• a road from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive; and</li> <li>• <del>new</del> <u>improvements to cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site and the White Horse Business Park.</u></li> </ul> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> <li>• <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u></li> <li>• <u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements;</u></li> <li>• <u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u></li> <li>• <u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS; and</u></li> <li>• <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u></li> </ul> <p><u>Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements and opportunities, delivered to achieve the comprehensive development of the site, including the timely and coordinated provision of necessary infrastructure.</u></p>
MM25	Paragraph 5.46	FMM 9, PC 55 (and PC 54, now superseded)	Amend text as follows:

			Approximately <del>17.61</del> <del>14.33</del> ha of land at Elm Grove Farm is allocated for the development of approximately <del>200</del> <del>250</del> dwellings, <u>along with a multi-purpose community facility co-located with consolidated and improved public open space</u> , as shown on the Policies Map. It is well located...
MM26	Paragraph 5.47	PC 57	Insert additional text at the start of paragraph 5.47:  <u>Proposals to develop the site will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy.</u> The existing natural features of the site...
MM27	Paragraph 5.48	FMM 10	Amend text:  The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on and adjacent to the site. <del>These would</del> <u>will be identified through survey and assessments guided by the requirements of the TBMS and include:</u> Drynham Lane/Road, the railway line, woodland belts associated with the White Horse Business Park and the small tributary to the River Biss.
MM28	Paragraph 5.49	FMM 11 (and PC 52 now superseded)	Amend the first sentence and add text to the end of the paragraph as follows:  These features should be retained and / or buffered from development (including residential gardens) by wide <del>(10-16m)</del> , dark ( <del>&lt;1 lux</del> ), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. <del>Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy.</del> <u>The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments.</u> <u>Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary.</u>
MM29	Paragraph 5.50	PC 58 and FMM 12	Amend the fifth sentence as follows:  Access to the site would need to be holistically planned with upgrades required to Drynham Lane, along with the construction of a connection to the A363 designed as a through-route anticipating future traffic growth. New and improved walking and cycling routes to existing and planned local services would encourage future residents to use sustainable forms for transport. The site has medium potential for archaeological remains. Therefore any subsequent planning application should be informed by an archaeological assessment. In addition, development will need to minimise the potential to harm the

			significance of the Grade II Listed Drynham Lane Farmhouse <u>along with Grade II listed Southview Farmhouse and, where appropriate, their settings.</u> Measures may also be necessary to prevent potential noise pollution from the existing main road and railway. These considerations should be addressed through the process of detailed design and layout which should be informed <del>through a Heritage Impact Assessment</del> <u>by detailed assessments (including heritage) to support any subsequent planning applications.</u>
MM30	Paragraph 5.51	FMM 13	Amend text:  <del>In order to facilitate development a</del> <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at additional local schools, capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.</u>
MM31	Figure 5.5	PC54	Amend Figure 5.5 (see end of schedule - Map 'H2.1: Elm Grove, Trowbridge' )
MM32	Insert new policy	FMM 14	New policy for H2.2 as follows:  <b><u>Land off A363 at White Horse Business Park, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b>  <ul style="list-style-type: none"> <li>• <b><u>approximately 175 dwellings;</u></b></li> <li>• <b><u>vehicular access from the A363;</u></b></li> <li>• <b><u>development to be directed to the north and east of the site; and</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link into the existing network.</u></b></li> </ul> <b><u>Development will be subject to the following requirements:</u></b>  <ul style="list-style-type: none"> <li>• <b><u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u></b></li> <li>• <b><u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u></b></li> <li>• <b><u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, incorporating open space provision. Development will be expected to enhance a key gateway approach to the town and retain visual separation between the town and North Bradley;</u></b></li> </ul>



			<ul style="list-style-type: none"> <li>• <b><u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments. Development proposals will make a positive contribution towards conserving and enhancing the significance of the Baptist burial ground, its gateway and its setting; and</u></b></li> <li>• <b><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u></b></li> </ul> <p><b><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></b></p>
MM33	Paragraph 5.52	PC 60	<p>Amend first sentence of paragraph 5.52 as follows:</p> <p>...land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately <del>450</del> <u>175</u> dwellings, as identified on the Policies Map.</p>
MM34	Paragraph 5.54	FMM 15	<p>Amend paragraph as follows:</p> <p>The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site <u>will be identified through survey and assessments guided by the requirements of the TBMS</u> and include: woodland belts associated with the White Horse Business Park; a network of mature hedgerows / hedgerow trees; and the grounds of Willow Grove.</p>
MM35	Paragraph 5.55	FMM 16 (incorporating PC 52)	<p>Amend text of first sentence and add additional text to end of paragraph as follows:</p> <p>These features should be retained and / or buffered from development (including residential gardens) by wide <del>(10-16m)</del>, dark <del>(&lt;1 lux)</del>, continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. <u>The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy.</u></p>

MM36	Existing Paragraph 5.56	PC 62	<p>Amend paragraph to read:</p> <p>Proposals would need to provide for a high quality, sustainable development that enhances a key gateway approach to the town, whilst protecting the integrity of North Bradley as a village. <u>In addition, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.</u></p>
MM37	New paragraph after paragraph 5.56	PC 61 as amended by FMM 17	<p>Add new paragraph after paragraph 5.56, as follows:</p> <p><u>As identified in the Council's Heritage Impact Assessment, the site is an historic agricultural landscape and comprises a cluster of historic farmsteads where the farm houses and ancillary buildings may be susceptible to setting change. This includes Kings Farmhouse (Grade II listed), Willow Grove (Grade II listed), Little Common Farm (non-designated asset), Manor Farmhouse (Grade II listed) and Woodmarsh Farm (non-designated asset). An area of the site is also adjacent to a Baptist cemetery with an ornamental gateway structure (Grade II listed) and curtilage listed perimeter walls. A comprehensive approach to development will need to be undertaken that makes a positive contribution towards conserving and enhancing the significance of heritage assets. At the planning application stage, the layout and design of the site must give great weight to conserving the significance of these heritage assets and their setting in order to minimise harm. The Baptist burial ground and gateway is in poor condition and in ensuring that a comprehensive approach is taken to the development of the site, a positive contribution will also be required towards conserving and enhancing the significance of this heritage asset and it's setting. It will be expected that the developer of the site will work with the Church to ensure that a positive strategy is in place to protect and enhance the Baptist burial ground and gateway. The archaeological potential of the site is likely to be high. Given the potential for heritage assets with archaeological interest to be present within the site, field evaluations will need to be carried out and taken into account in developing proposals, to minimise any conflict between the heritage asset's conservation and any aspect of the proposal.</u></p>
MM38	Paragraph 5.57	FMM 18	<p>Amend text as follows:</p> <p><del>In order to facilitate development a</del> <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at additional local schools, capacity. Funding contributions may also be sought</u></p>

			<p><del>where needed to increase capacity at</del> local GP surgeries and dentistry at the town <u>in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM39	Figure 5.6	PC 59	Amend Figure 5.6 (see end of Schedule - Map 'H2.2: Land off A363 White Horse Business Park, Trowbridge')
MM40	Insert new policy Figure 5.7	FMM 19	<p>Insert new policy for H2.3 as follows:</p> <p><b><u>Land to the South West of Elizabeth Way, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 355 dwellings;</u></b></li> <li>• <b><u>vehicular access points from Elizabeth Way; and</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link into the existing network.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u></b></li> <li>• <b><u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u></b></li> <li>• <b><u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u></b></li> <li>• <b><u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, incorporating noise attenuation measures and open space provision; and</u></b></li> <li>• <b><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u></b></li> </ul> <p><b><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></b></p>

MM41	Paragraph 5.58	PC 64	Amend first sentence in paragraph 5.58 as follows:  ... land to the South West of Elizabeth Way is allocated for the development of approximately <del>205</del> <u>355</u> dwellings, as identified on the Policies Map.
MM42	Paragraph 5.60	FMM 20	Amend text:  This site may be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Potentially sensitive habitat features on / adjacent to the site <u>will be identified through survey and assessments guided by the requirements of the TBMS and include:</u> mature trees; hedgerows; and stream (minor watercourse) at the northern end of the site.
MM43	Paragraph's 5.61 and 5.62	FMM 21	Amend and merge paragraphs 5.21 and 5.22 as follows:  These features should be retained and / or buffered from development (including residential gardens) by wide <del>(10-16m)</del> , dark <del>(&lt;1 lux)</del> , continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. <u>The design and layout of development, including the size and location of landscape corridors, lighting and other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will also be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy through a financial contribution or direct provision of equivalent new infrastructure over and above normal Council requirements to deliver new habitat and recreational opportunities in line with criteria in the Strategy.</u>
MM44	Paragraph 5.63	PC 66	Amend paragraph to read:  An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be provided to support a comprehensive development of the site. <u>Proposals will therefore need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters of layout and design.</u>
MM45	Add to beginning of para 5.64	PC 65	Add text to beginning of paragraph 5.64:

			<p>The site comprises historic field boundaries and has high archaeological value. It is adjacent to Trowbridge (Hilperton Road) Conservation Area and to Fieldways Highfield (Grade II* listed), a country house. Fieldways Highfield and its setting will need to be conserved in a manner appropriate to its significance. The relationship between development proposals and these heritage assets will need to be rigorously addressed through detailed design including provision for open greenspace in any layout. The layout and design of the site ...</p>
MM46	Paragraph 5.66	FMM 22	<p>Amend text as follows:</p> <p><del>In order to facilitate development a</del> <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at additional local schools, capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM47	Figure 5.7	PC 63	Amend Figure 5.7 (see end of schedule – Map ‘H2.3: Elizabeth Way, Trowbridge’)
MM48	Insert new policy after Figure 5.8	FMM 23	<p>Insert new policy for H2.4 as follows:</p> <p><b><u>Land at Church Lane, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 45 dwellings focused towards the north of the site;</u></b></li> <li>• <b><u>sensitively designed vehicular access via a new junction arrangement off the A361 that incorporates discreet lighting, signage and boundary treatments to avoid unacceptable harm to heritage assets and their settings; and</u></b></li> <li>• <b><u>improve cycling and walking routes through the site to link to the existing network, including links between the site, Southwick Country Park and the existing network, including footpath TROW8.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u></b></li> <li>• <b><u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u></b></li> <li>• <b><u>retention and enhancement of hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible Green Infrastructure corridor along the Lambrok Stream to protect and enhance the character,</u></b></li> </ul>

			<p><b><u>biodiversity value and amenity of Southwick Country Park in conjunction with development at Southwick Court and Upper Studley;</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>sensitive design and layout, which ensures the significance of heritage assets and their settings, including the contribution made by the paddock adjacent to Church Lane, are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments; and</u></b></li> <li>• <b><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u></b></li> </ul> <p><b><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively addresses the urban edge of the town.</u></b></p>
MM49	Paragraph 5.68	PC 68 and FMM 24	<p>Amend paragraph 5.68 to read as follows</p> <p><del>Development proposals would need to ensure that the significance and setting of the Grade II Listed St John's Church would be appropriately protected. To achieve this objective, access to the site would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane. The site is adjacent to the Church of St John (Grade II listed), 344 Frome Road (Grade II Listed) and paddocks. There are key views across the site to St John's spire from Southwick Country Park. The site comprises the degraded fragmentary remains of a post medieval water meadow system. A comprehensive approach to development will need to be undertaken that makes a positive contribution towards conserving and enhancing the significance of heritage assets. Development should therefore avoid the paddock adjacent to Church Lane and the rear of listed buildings that front Frome Road. Access to the site must be sensitively designed and accommodated in manner that minimises harm to heritage assets. This would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane.</del></p>
MM50	Paragraph 5.67	PC 69	<p>Add text at the end of paragraph 5.67 as follows:</p> <p><u>...It is an open site that slopes to the south-west towards the Lambrok Stream. As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In</u></p>

			<u>addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the south-west margins of the site to slow the flow of surface water into the Lambrok Stream.</u>
MM51	Paragraph 5.69	FMM 25	Amend the paragraph as follows:  ...Existing hedgerows and trees would need to be retained and enhanced through new landscaping features along the line of the Lambrok Stream. <u>The Lambrok Stream should be enhanced as a local amenity feature of the site in conjunction with development proposed at Southwick Court and Upper Studley.</u> Such features would need to be of sufficient scale to protect and enhance the character and amenity provided by Southwick Country Park. Links between the site, the Country Park and existing built form would be achieved through improvements to footpath TROW8.
MM52	Paragraph 5.70	FMM 26	Amend paragraph as follows:  The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site <u>will be identified through survey and assessments guided by the requirements of the TBMS and include: Framfield; boundary hedgerows / tree lines; and the Lambrok Stream.</u>
MM53	Paragraph 5.71	FMM 27	Amend text of first sentence and add additional text to end of paragraph as follows:  These features should be retained and / or buffered from development (including residential gardens) by wide <del>(10-16m)</del> , dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. <u>The design and layout of development, including the size and location of landscape corridors, lighting and other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will be required to contribute towards the delivery of the Trowbridge Bat Mitigation Strategy.</u>
MM54	Paragraph 5.72	FMM 28	Amend text:  <del>In order to facilitate development a</del> <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at additional local schools, capacity. Funding contributions may also be sought</u>

			where needed to increase capacity at local GP surgeries and dentistry at the town <u>in accordance with core policies of the Wiltshire Core Strategy.</u>
MM55	Figure 5.6		Amend Figure 5.6 (see end of Schedule – Map ‘H2.4: Church Lane, Trowbridge’)
MM56	Insert new policy	FMM 29	<p>New policy for H2.5 as follows:</p> <p><b><u>Land at Upper Studley, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 45 dwellings;</u></b></li> <li>• <b><u>vehicular access via a new junction arrangement off the A361; and</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link into the existing network.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate survey, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u></b></li> <li>• <b><u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u></b></li> <li>• <b><u>an attractive frontage to A361 and enhancement of this approach to the town;</u></b></li> <li>• <b><u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible Green Infrastructure corridor along the Lambrok Stream to protect and enhance the character, biodiversity and amenity provided by Southwick Country Park in conjunction with development at Southwick Court and Church Lane; and</u></b></li> <li>• <b><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u></b></li> </ul> <p><b><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive</u></b></p>



			<b><u>and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively addresses the urban edge of the town.</u></b>
MM57	Paragraph 5.73	PC 70	Amend first sentence of paragraph 5.73 to read:  Approximately <del>2.33</del> <u>2.27</u> ha of land at Upper Studley is allocated for the development of approximately <del>20</del> <u>45</u> dwellings, as identified on the Policies Map.
MM58	Paragraph 5.73	PC 71	Add text to end of paragraph 5.73 as follows:  <u>...The land slopes towards the stream and is bound to the south by tall, mature poplar trees. As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the southern margins of the site to slow the flow of surface water into the Lambrok Stream.</u>
MM59	Paragraph 5.74	FMM 30	Amend first sentence and add additional text to the end of the paragraph as follows:  An objective of detailed design and layout will be to provide an attractive frontage to <del>Firs Hill</del> <u>the A361, and that enhances this approach to the town with vehicular access to the A361 along with cycling and walking routes into Trowbridge.</u> The existing natural features of the site are significant in the landscape and would be incorporated within a detailed layout and Lambrok Stream should be enhanced as a local amenity feature of the site in conjunction with development <del>proposed</del> <u>allocated</u> at Southwick Court <u>and Church Lane.</u>
MM60	Paragraph 5.76	FMM 31	Amend text of first sentence and add additional text to end of paragraph as follows:  These features should be retained and / or buffered from development (including residential gardens) by wide <del>(10-16m)</del> , dark <del>(&lt;1 lux)</del> , continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats <u>The design and layout of development, including the size and location of landscape corridors, lighting and other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will be required to contribute towards the delivery of the Trowbridge Bat Mitigation Strategy.</u>

MM61	Insert new paragraph after 5.76	FMM 32	<p>Insert new paragraph as follows:</p> <p><u>The masterplan of the site and those prepared to guide the development of neighbouring sites H2.4 and H2.6 must take a joined-up approach towards addressing necessary infrastructure and cumulative issues associated with heritage, landscape, biodiversity and highway access through layout and design. Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM62	<p>Insert new policy</p> <p>Figure 5.10</p>	FMM 33	<p>New policy for H2.6 as follows:</p> <p><b><u>Land at Southwick Court, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 180 dwellings;</u></b></li> <li>• <b><u>a sensitively designed vehicular access from the A361 and road across the site that minimises intrusion within the historic landscape. Signage should be kept to a minimum and particular attention given to reducing any adverse impacts of lighting;</u></b></li> <li>• <b><u>a controlled emergency vehicular access; and</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link in to the existing network.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>core bat habitat will be protected or enhanced. Design and layout will be informed by appropriate survey, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u></b></li> <li>• <b><u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u></b></li> <li>• <b><u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. New homes will be situated to the east of the Lambrok Stream and adjacent to the existing urban area in a manner that respects both the topography of the land and existing urban form to the immediate north. Land to the west of the Lambrok Stream will remain open and free from residential development. This shall be informed by appropriate heritage and archaeological assessments;</u></b></li> <li>• <b><u>a comprehensive approach to landscaping to enhance the urban edge of the town and in so doing protect and enhance the setting of Southwick Court Farmstead;</u></b></li> </ul>

			<ul style="list-style-type: none"> <li>• <u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible green corridor along the Lambrok Stream to protect and enhance the character and amenity provided by Southwick Country Park; and</u></li> <li>• <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u></li> </ul> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively addresses the urban edge of the town.</u></p>
MM63	Paragraph 5.78	PC 72 and FMM 34	<p>Amend paragraph 5.78 to read:</p> <p>The area is of historic significance as water meadows (non-designated heritage asset) associated with the Grade II* Listed Southwick Court Farmstead that lies to the south of the site. The Southwick Court Farmstead is a heritage asset of significant importance. It is a medieval, manorial farmstead that includes <u>a farmhouse, gatehouse and bridge juxtaposed with later post-medieval/modern additions surrounded by a moat.</u> An essential objective of detailed design will be to minimise harm to its significance. The setting to this heritage asset will be preserved, to the greatest extent possible, informed by the Councils <u>Heritage Impact Assessment and the results of further more detailed heritage assessment work to support any subsequent planning application. Heritage Impact Assessment.</u> Taking account of the weight attached to the significance of the assets, alone and in combination, any residual harm would require a clear and convincing justification within any subsequent planning application and should not be substantial. The social, environmental and economic advantages of the development, including the provision of homes along with significant improvements to biodiversity and provision of open space will achieve substantial public benefits. A <u>sensitively designed, comprehensive development scheme will need to minimise harm by ensuring ensure that new homes are directed to the east of the Lambrok Stream and built in a manner that respects both the topography of the land and existing urban form to the immediate north.</u> Land to the west may become either formal or informal open space or remain in agricultural use, but will not be developed for new homes. The character of the area will therefore help to retain the high significance of <u>Southwick Court and associated this heritage assets. The strategy for accessing the site must respect the significance of Southwick Court and the wider historic landscape it occupies. The road across the site and junction off the A361 (Frome Road) will therefore need to be sensitively designed and built in a manner</u></p>

			<u>that acknowledges the requirement to minimise intrusion within the historic landscape. Signage and lighting will be kept to a minimum and particular attention given to reducing any adverse impacts of lighting throughout the development. In addition, the creation of any access specifically for emergency vehicles will need to be sensitively designed to ensure that the removal of any existing trees/hedgerows is kept to a minimum and must have regard to biodiversity, landscape and heritage assets.</u>
MM64	Paragraph 5.79	PC 73	Add text to end of paragraph 5.79, as follows:  ...The Lambrok Stream and its respective flood plain should be enhanced as a local amenity feature of the site in conjunction with development proposed at Upper Studley above. <u>As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the northern margins of the site to slow the flow of surface water into the Lambrok Stream and associated field drainage systems.</u>
MM65	Paragraph 5.81	FMM 35	Amend text as follows:  The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site <u>will be identified through survey and assessments guided by the requirements of the TBMS and include: boundary hedgerows / tree lines; Axe and Cleaver Lane; the Lambrok Stream; and the moat and grounds at Southwick Court.</u>
MM66	Paragraph 5.82	FMM 36	Amend text of first sentence and add additional text to end of paragraph as follows:  These features should be retained and / or buffered from development (including residential gardens) by wide <del>(10-16m)</del> , dark ( <del>&lt;1 lux</del> ), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. <u>The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will be required to contribute towards the delivery of the Trowbridge Bat Mitigation Strategy.</u>
MM67	Paragraph 5.84	FMM 37	Amend text:

			<del>In order to facilitate development, a</del> The masterplan of the site and those prepared to guide the development of neighbouring sites H2.4 and H2.5 must take a joined-up approach towards addressing necessary infrastructure and cumulative issues associated with heritage, landscape, biodiversity and highway access through layout and design. <del>In order to facilitate development a</del> Appropriate contributions would be likely to be sought to help fund <del>an increase in capacity at additional local schools, capacity.</del> Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.
MM68	Paragraph 5.87	PC 75	Amend paragraph 5.87 as follows:  Development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage. <del>However, the scale of development is within the thresholds set down in</del> As such, a Nutrient Management Plan <u>seeks to for the river that</u> avoids the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. <u>For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.</u> Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in an annex to the Nutrient Management Plan.
MM69	New paragraph under 5.87	PC 74	Add new paragraph under 5.87 as follows:  <u>Developments will be required to address any direct or indirect cumulative impacts on the A36.</u>
MM70	Policy H2.7 Figure 5.11 Paragraphs 5.88-5.92	FMM 38	Delete heading 'H2.7 East of Dene, Warminster' and Figure 5.11 'H2;7 East of the Dene, Warminster'.  Delete Policy H2.7 and supporting paragraphs 5.88-5.92
MM71	Insert new policy Figure 5.12	FMM 39	Insert new policy for H2.8 as follows:  <b><u>Land at Bore Hill Farm, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b>  <ul style="list-style-type: none"> <li>• <b><u>approximately 70 dwellings;</u></b></li> <li>• <b><u>vehicular access from Deverill Road;</u></b></li> <li>• <b><u>B1 employment, located between the bio-digester and residential development; and</u></b></li> </ul>

			<ul style="list-style-type: none"> <li><u>improvements to cycling and walking routes through the site to link into existing network (including WARM60).</u></li> </ul> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> <li><u>noise, dust and odour assessments to inform design and layout to separate the built form and sensitive land uses from the adjoining waste management facility. Development will not be permitted where assessments conclude that a satisfactory living environment for future residents cannot be created.</u></li> <li><u>screening will be provided that has given due consideration to the operational waste management facility (bio-digester). Additional landscape screening at site boundaries to preserve the amenity of adjoining residential dwellings; and</u></li> <li><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site.</u></li> </ul> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>
MM72	Paragraph 5.94	PC 80	<p>Amend paragraph to read:</p> <p>The site is formed of land between the A36 and Deverill Road which lies adjacent to the Bore Hill Farm bio-digester. <u>Considering the site context, any subsequent development proposals (e.g. layout and screening) will need to take account of potential issues associated with the operational waste management facility, these may include: noise, dust and odour.</u> There is some limited screening on the north boundary with existing development at Bradley Close and Ludlow Close. Additional landscape screening at the site boundaries would be required to preserve and maintain the living conditions of adjoining residential dwellings. Vehicular access will be provided from Deverill Road, and connection to and improvement of public right of way WARM60 should be provided. <u>In addition, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change).</u></p>
MM73	Paragraph 5.96	FMM 40	<p>Amend final sentence at end of paragraph as follows:</p> <p>Future development of the site shall be brought forward in such a way that ensures the residential and employment uses on the site are compatible. In line with WCS Core Policy 41, opportunities should be</p>

			<p>explored for new development to use energy generated by the adjoining biodigester. <del>In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town. Appropriate contributions may also be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</del></p>
MM74	Figure 5.12	PC79	Amend Figure 5.12 (see end of schedule – Map 'H2.8: Bore Hill Farm, Warminster')
MM75	Insert new policy	PC 81 & PC 82 and FMM 41	<p>Insert new policy for H2.9 as follows:</p> <p><b><u>Land at Boreham Road, as identified on the Policies Map, is allocated for development comprising of the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 30 dwellings;</u></b></li> <li>• <b><u>access will be provided from Boreham Road; and</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link into the existing network including the reconstruction of pedestrian footways onto Boreham Road.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u></b></li> <li>• <b><u>measures to safeguard protected species and habitats of importance for biodiversity, including the retention and enhancement of trees and hedgerows as wildlife corridors as informed by an ecological assessment; and</u></b></li> <li>• <b><u>measures to protect the integrity of the River Avon SAC, with particular regard to phosphate discharge into the River Avon and its tributaries. This will be informed by appropriate survey and impact assessment; and</u></b></li> <li>• <b><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site.</u></b></li> </ul> <p><b><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></b></p>

MM76	Paragraph 5.99	PC 81	<p>Amend paragraph to read:</p> <p>Whilst situated outside the Bishopstrow Conservation Area, the site is considered to lie within the setting of this designated heritage asset. Development of the site would therefore need to respond positively to its surroundings and have due regard to the special character or appearance of the Conservation Area. <del>A Heritage Impact Assessment</del> <u>In line with national policy, an assessment of heritage assets and their significance (including the contribution made by their setting) would be required in order to support any subsequent proposals, including the design of mitigation measures. The setting of heritage assets will be protected so as to ensure, as far as practicable, there will be no substantial harm to their significance.</u></p>
MM77	Paragraph 5.100	PC 82	<p>Delete paragraph 5.100 and replace with text to read:</p> <p><del>Development of the site would need to be supported and informed by a Drainage Strategy and water infrastructure capacity assessment. Where necessary, details relating to the reinforcement of existing foul/storm water drainage arrangements would need to be submitted with any subsequent planning application. Drainage measures for the attenuation and management of surface water would need to be capable of achieving greenfield, or better, infiltration rates. Parts of the site lie within Flood Zones 2 and 3. Therefore development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy and water infrastructure capacity assessment. Where necessary, details relating to the reinforcement of existing foul/storm water drainage arrangements will need to be submitted with any subsequent planning application.</del></p>
MM78	Paragraph 5.101	FMM 42	<p>Amend supporting text as follows:</p> <p>Vehicular access would be achieved from Boreham Road. Details relating to the provision of the junction arrangements; <del>relocation of Grade II Listed milestone marker</del>; culvert arrangements; closure of existing agricultural field gate and reconstruction of pedestrian footways onto Boreham Road would need to be submitted with any planning application. <del>In order to facilitate development, a</del> <u>Appropriate contributions would be likely be sought to help fund <b>an increase in capacity at</b> additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town. <b>Appropriate contributions sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</b></u></p>
MM79	Insert new policy	FMM 43	<p>Insert new policy for H2.10 as follows:</p>



	Figure 5.14		<p><b><u>Land at BarTERS Farm, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 35 dwellings;</u></b></li> <li>• <b><u>vehicular access from Cleyhill Gardens; and</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link into the existing network including CHAP14.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>retention and enhancement of trees and hedgerows as part of wider landscaping and green infrastructure requirements;</u></b></li> <li>• <b><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site;</u></b></li> <li>• <b><u>an ecological assessment to inform design and layout of the development, along with on and off-site mitigation and monitoring measures as appropriate due to its location within the core buffer area of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC); and</u></b></li> <li>• <b><u>an archaeological assessment to inform site layout.</u></b></li> </ul> <p><b><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></b></p>
MM80	Paragraph 5.103	PC 83 and PC 84	<p>Add text to the end of paragraph 5.103 to read:</p> <p>... impacting on ecological features such as Ancient Woodland that lies on the periphery of much of the settlement. <u>Public right of way CHAP14 runs along the northern boundary of the site. This will be retained and enhanced through the development of the site. Considering the size of the site, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.</u></p>
MM81	Insert new paragraph after 5.103	FMM 44	<p>Insert new paragraphs after paragraph 5.103 as follows:</p>

			<p><u>The site is within the core buffer area of the Bath and Bradford On Avon Bats Special Area of Conservation (SAC), as set out in Planning Guidance, and therefore there may be potential for bats to use the site and so mitigation measures such as new tree/hedgerow planting may be necessary. An ecological assessment will be required to identify potential impacts and set out appropriate mitigation. This may include the need to make financial contributions in relation to off-site mitigation measures. There is also potential for archaeological remains, therefore this too would need full assessment.</u></p> <p><u>Additional screening on the site boundaries will be required in order to preserve and maintain landscape quality and edge of settlement setting, and to protect the amenity of adjoining residential dwellings.</u></p> <p><u>In order to facilitate development, appropriate contributions would likely be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM82	Policy H2.11 Figure 5.15 Paragraphs 5.104 to 5.107.	FMM 45	<p>Delete heading 'H2.11 The Street, Hullavington' and Figure 5.12 'H2.11 The Street, Hullavington',</p> <p>Delete Policy H2.11 and supporting paragraphs 5.104-5.107</p>
MM83	Insert new policy Figure 5.16	FMM 46	<p>Insert new policy for H2.12 as follows:</p> <p><b><u>Land to the east of Farrells Field, Yatton Keynell as identified on the Policies Map, is allocated for development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 30 dwellings;</u></b></li> <li>• <b><u>vehicular access from B4039; and</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link into the existing network.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>retention and enhancement of trees and hedgerows as part of wider strategic landscaping and green infrastructure requirements, incorporating open space provision;</u></b></li> <li>• <b><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off site; and</u></b></li> </ul>

			<ul style="list-style-type: none"> <li>• <u>an integrated water infrastructure strategy to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site.</u></li> </ul> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>
MM84	Paragraph 5.109	PC 89 and FMM 47	<p>Amend supporting text after the first sentence of paragraph 5.109 as follows:</p> <p>...land, as shown on the Policies Map. <u>Considering the size of the site any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. In addition, as the site lies within Groundwater Protection Zone 2 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy. An integrated water infrastructure strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off-site. <del>It is</del> The site is well located with regard to local services and facilities. The site <del>it is</del> in agricultural use and represents the continuation of recent development in this part of the settlement.</u></p>
MM85	Paragraph 5.110	PC 90	<p>Amend text to read:</p> <p><del>A woodland corridor along the western boundary should be retained as a wildlife corridor. Retention of the existing boundary vegetation...</del></p>
MM86	Paragraph 5.110	PC 91	<p>Amend text to read:</p> <p>...on site would provide screening to reduce the effect on adjacent visual receptors and be in keeping with the existing landscape character. <del>Access would be taken from Farrell Fields and t</del> <u>The possibility to link to adjacent footpaths should be explored.</u></p>
MM87	Add new paragraph after 5.110	FMM 48	<p>Insert new text after paragraph 5.110</p> <p><u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</u></p>

MM88	Figure 5.16	PC 88	Amend Figure 5.16 (see end of schedule – Map ‘H2.12: East of Farrells Field, Yatton Keynell’)
MM89	Housing Allocation H2.13	PC 92	Delete section titled ‘Malmesbury Community Area Remainder’ and ‘H2.13 Ridgeway Farm, Crudwell’.  Delete Figure 5.17; delete paragraphs 5.111 to 5.114.  Re-number subsequent paragraphs.
MM90	Insert new policy	FMM 49	<p>Insert new policy for H2.13 as follows:</p> <p><b><u>Land at Court Orchard/Cassways, as identified on the Policies Map, is allocated for development comprising of the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 35 dwellings;</u></b></li> <li>• <b><u>vehicular access from B3098; and</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link into the existing network including BRAT24 and BRAT25.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>development will be informed by an ecological assessment detailing suitable mitigation measures to ensure the safeguarding of protected species and habitats of importance for biodiversity;</u></b></li> <li>• <b><u>retention and enhancement of trees and hedgerows on the site boundaries as part of wider landscaping and green infrastructure requirements. Development will be expected to take particular care to ensure that a suitable boundary with the open countryside is provided that protects or enhances landscape quality and the setting of the edge of the settlement;</u></b></li> <li>• <b><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off site; and</u></b></li> <li>• <b><u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments.</u></b></li> </ul> <p><b><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></b></p>

MM91	Paragraph 5.116	PC 94	Amend first sentence of paragraph 5.116 to read:  ... Court Orchard/Cassways is allocated for the development of approximately <u>35</u> <del>40</del> dwellings, as identified on the Policies Map.
MM92	Paragraph 5.117	FMM 50	Add additional text at end of paragraph as follows:  The site comprises a roughly rectangular field that slopes down towards the north. The site is situated on the edge of Bratton and is within a Special Landscape Area. A part of the site also adjoins the Bratton Conservation Area. <u>In addition, due to the proximity of Bratton Camp Scheduled Monument and the prehistoric / medieval potential at this location, heritage and archaeological assessments will be required to support a planning application.</u>
MM93	Paragraph 5.119	FMM 51	Additional text added to paragraph as follows:  Additional screening at the site boundaries would be required to preserve and <del>maintain</del> enhance the landscape quality, Conservation Area and edge of settlement setting, and to protect the amenity of adjoining residential dwellings. A new visual boundary to the settlement will need to be established along the site's western edge <del>and new woodland planting will be a substantial part of a scheme.</del> <u>This should respect the existing landscape value and character of the area, while ensuring a suitable transition between the village and open countryside.</u>
MM94	5.120	PC 95	Amend paragraph to read:  <del>Part of the site is susceptible to surface water flooding and a flood risk assessment will have to pay particular regard to this and inform the design of the site.</del> <u>Considering the size of the site and the fact that part of the land is susceptible to surface water flooding, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.</u>
MM95	Insert new paragraph after 5.121	FMM 52	Insert new paragraph after paragraph 5.121 as follows:  <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</u>

MM96	Policy H3 Table 5.4  Paragraph 5.124	PC 32 & PC 96 and FMM 53	<p>(PC32) Amend title in third column in Table 5.4 as follows:</p> <p><del>No of dwellings</del> <u>Approximate number of dwellings</u></p> <p>Delete the title 'Policy H3' and the shaded text box but retain the rest of the information as supporting text as part of paragraph 5.124, as follows:</p> <p>Other allocations are made at Durrington, a Market Town with Amesbury and Bulford, to supports its role. <u>The following sites are allocated for development:</u></p> <p><del>Policy H3 Land is allocated for residential development at the following sites, as shown on the policies map:</del></p> <p>Table 5.4 Housing Allocations in the South Wiltshire Housing Market Area</p> <table border="1" data-bbox="757 624 1718 1318"> <thead> <tr> <th>Community Area</th> <th>Reference</th> <th>Site Name</th> <th><del>No of dwellings</del> <u>Approximate number of dwellings</u></th> </tr> </thead> <tbody> <tr> <td rowspan="5">Salisbury</td> <td>H3.1</td> <td>Netherhampton Road, Salisbury</td> <td>640</td> </tr> <tr> <td>H3.2</td> <td>Hilltop Way</td> <td>10</td> </tr> <tr> <td>H3.3</td> <td>North of Netherhampton Road</td> <td>100</td> </tr> <tr> <td>H3.4</td> <td>Land at Rowbarrow</td> <td>100</td> </tr> <tr> <td><u>H3.5</u></td> <td><u>The Yard, Hampton Park</u></td> <td><u>14</u></td> </tr> <tr> <td rowspan="2">Amesbury</td> <td>H3.6</td> <td>Clover Lane, Durrington</td> <td>45</td> </tr> <tr> <td>H3.7</td> <td>Larkhill Road, Durrington</td> <td>15</td> </tr> </tbody> </table>	Community Area	Reference	Site Name	<del>No of dwellings</del> <u>Approximate number of dwellings</u>	Salisbury	H3.1	Netherhampton Road, Salisbury	640	H3.2	Hilltop Way	10	H3.3	North of Netherhampton Road	100	H3.4	Land at Rowbarrow	100	<u>H3.5</u>	<u>The Yard, Hampton Park</u>	<u>14</u>	Amesbury	H3.6	Clover Lane, Durrington	45	H3.7	Larkhill Road, Durrington	15
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	H3.7	Larkhill Road, Durrington	15																											
MM97	Paragraph 5.128	PC 98	Amend 3 <sup>rd</sup> bullet point to read:																											

			<p>“Biodiversity: development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss / damage. <del>However, the scale of development is within thresholds set down in a</del> As such, the Nutrient Management Plan <u>seeks to for the river that</u> avoids the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. <u>For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency.</u> Measures will therefore need to be in place to ensure that <u>developments do not contribute to a net increase in phosphates for the River Avon SAC.</u> Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in an annex to the Nutrient Management Plan.</p>
MM98	Policy H3.1	PC 102 and FMM 54	<p>Amend Policy H3.1 as follows:</p> <p><b><u>Approximately 63ha of Land at Netherhampton Road, as identified on the Policies Map, is proposed allocated for mixed-use development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 640 dwellings;</u></b></li> <li>• <b><u>sensitively designed vehicular access from the A3094 Netherhampton Road with minimal signage and lighting to ensure views of Salisbury Cathedral spire are not subject to unacceptable harm;</u></b></li> <li>• <del>Land for employment (B1, B2 and B8 uses of the Use Classes Order)</del></li> <li>• <b><u>measures to positively support walking, cycling and public transport use between the site and Salisbury, including improvements to bridleway NHAM10;</u></b></li> <li>• <b><u>at least 1.8ha of land for a two-form entry primary school along with playing pitches;</u></b></li> <li>• <b><u>a local centre of an appropriate scale to provide local access to services and facilities; and</u></b></li> <li>• <b><u>a Country Park of at least 10ha in size, located in the east and south of the site, with associated parking and facilities, provision of strategic landscaping and appropriately located public open space and green infrastructure throughout the rest of the site.</u></b></li> </ul> <p>Development will be subject to the following requirements:</p> <ul style="list-style-type: none"> <li>• <b><u>design and layout to be guided by appropriate heritage and archaeological assessments;</u></b></li> <li>• <del>strategic landscaping and open space provision. A</del> <b><u>all built development to be located below the 75m contour and a Country Park to be located in the east and south of the site;</u></b></li> <li>• <b><u>provision made for transport network improvements necessary to accommodate the scale of development envisaged, as identified through a comprehensive transport assessment;</u></b></li> <li>• <del>Provision of sufficient school and contributions towards education and on or off-site</del> <b><u>healthcare capacity to meet the needs created by the development;</u></b></li> </ul>

			<ul style="list-style-type: none"> <li>• measures to safeguard the interest of Harnham Hill Chalk Pit SSSI and Harnham Slope County Wildlife Site;</li> <li>• <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design of the site so that surface water is controlled and does not exacerbate flooding off site;</u></li> <li>• <u>measures to protect the integrity of the River Avon SAC, with particular regard to phosphate discharge into the River Avon and its tributaries. This will be informed by appropriate survey and impact assessment;</u></li> <li>• <u>provision made for improvements to local sewerage systems, informed by a water infrastructure capacity appraisal; and</u></li> <li>• <u>surface water management, to include comprehensive surface water drainage measures (including a sustainable drainage system), that achieves equivalent or less better than current greenfield rates of run-off.</u></li> </ul> <p><u>Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>
MM99	Paragraph 5.129	FMM 55	<p>Amend supporting text as follows:</p> <p>Approximately 63ha of land to the south of Netherhampton Road, as shown on the Policies Map, is allocated for development of approximately 640 dwellings, <del>employment land and</del> a new two-form of entry primary school and a local centre of an appropriate scale to provide local access to services and facilities, <u>including a convenience store and potentially healthcare facilities if provided on-site. An impact assessment will be required in line with Core Policy 38 of the Wiltshire Core Strategy.</u></p>
MM100	Paragraph 5.129	PC 99	<p>Amend 2nd and 3<sup>rd</sup> sentences of paragraph 5.129 to read:</p> <p>All built development will be below the <del>75</del> 70m contour and a scheme will include a country park and extensive planting. Development of this site represents necessary growth to support the delivery of housing at Salisbury and thereby <u>contribute towards</u> <del>maintain a 5-year housing land supply position</del> within the South Wiltshire Housing Market Area.</p>
MM101	Paragraph 5.131	FMM 56	<p>Add new sentences at the end of the paragraph as follows:</p> <p><u>Development will also increase demand for primary health care facilities (GP services) in Salisbury. Additional provision would need to be provided to address limited capacity and support planned growth.</u></p>



			<u>This may be delivered on-site or off-site by funding contributions towards and/or provision of health facilities, in accordance with Core Policies of the Wiltshire Core Strategy.</u>
MM102	Paragraph 5.132	FMM 57	Delete paragraph as follows:  <del>The site will include an element of employment alongside other uses. Evidence does not suggest a specific quantum of employment land. The site has a strategic role as a possible destination for the relocation of businesses to allow the redevelopment of the Churchfields strategic allocation of the WCS. A scale and form of employment would be a matter for discussion with relevant stakeholders as a part of preparing a masterplan for the site but would be delivered in the form of serviced land.</del>
MM103	Paragraph 5.134	FMM 58	Amend paragraph as follows:  <u>The archaeological potential of the site is demonstrably high.</u> The site includes prehistoric barrows, field systems and enclosures and very high archaeological potential. However, the site is large, and the exact extent of work is uncertain. At the planning application stage, the layout and design of the development will need to give great weight to conserving heritage assets and their setting in a manner proportionate to their significance. The site has been subject to archaeological assessment, geophysical survey and evaluation trenching, with archaeological interest shown to be present across the site. These investigations should inform a the masterplan for the site and an archaeological assessment would be required to support a subsequent planning application.
MM104	Paragraph 5.138	PC 103	Amend paragraph to read:  A water infrastructure capacity appraisal will be needed to confirm the scope and extent of works to service new development. This should include the capacity of local sewer systems. <del>A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures.</del> Bearing in mind the size of the site, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. Sufficient land would need to be set aside for robust surface water management, to include a comprehensive Surface Water Drainage Scheme measures (including a Sustainable Drainage System) that results in run-off rates equalling, or <del>greater than</del> <u>bettering</u> current greenfield infiltration rates.
MM105	Insert new policy  Figure 5.20	FMM 59	Insert new policy for H3.2 as follows:  <b><u>Land at Hilltop Way, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b>

			<ul style="list-style-type: none"> <li>• <u>approximately 10 dwellings;</u></li> <li>• <u>vehicular access via Hilltop Way; and</u></li> <li>• <u>the public right of way forming the northern boundary of the site should be maintained and its route enhanced.</u></li> </ul> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> <li>• <u>identification and establishment of a suitable receptor site for the translocation of slow worms in the adjacent country park, to be agreed with the Council's ecologist. Development shall not take place until the receptor site has been agreed and translocation has taken place to the satisfaction of the Council's ecologist; and</u></li> <li>• <u>appropriate location of new dwellings and high-quality design including landscaping and open space to mitigate impacts on skyline views.</u></li> </ul> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>
MM106	Paragraph 5.141	FMM 60	<p>Amend paragraph text as follows:</p> <p>The site has been shown to have a high population of reptiles (<del>S</del>slow <del>W</del>worms) and these will need to be re-colonised on a suitable receptor site within the Country Park, prior to development taking place. <del>It will be important to demonstrate that the mitigation proposals are consistent with Laverstock and Ford Parish Council's wider aims for the Country Park.</del></p>
MM107	Insert new policy	FMM 61	<p>Insert new policy for H3.3 as follows:</p> <p><u>Land North of Netherhampton Road, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> <li>• <u>approximately 100 dwellings;</u></li> <li>• <u>vehicular access to the site from A3094 Netherhampton Road; and</u></li> <li>• <u>improvements to cycling and walking routes through the site to link into the existing network.</u></li> </ul> <p><u>Development will be subject to the following requirements:</u></p>

			<ul style="list-style-type: none"> <li>• <u>sensitive high-quality design and layout which ensures the significance of heritage assets and their settings are not subject to unacceptable harm, in particular the setting of Salisbury Cathedral spire. This will be achieved through:</u> <ul style="list-style-type: none"> <li>○ <u>the use of appropriate heritage and archaeological assessments to guide development;</u></li> <li>○ <u>a comprehensive approach to landscaping, green infrastructure and open space, including provision of an open corridor through the site to retain important views;</u></li> <li>○ <u>sensitive treatment of site boundaries. Development will be expected to take particular care to ensure a suitable boundary and transition between the open countryside and the City;</u></li> <li>○ <u>development which respects the scale, massing and built form of the local area and the setting of the Cathedral;</u></li> <li>○ <u>development along Netherhampton Road being set back, but providing an active frontage; and</u></li> <li>○ <u>sensitive use of lighting and signage with regard to infrastructure and highway elements throughout the development.</u></li> </ul> </li> <li>• <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design of the site so that surface water is controlled and does not exacerbate flooding off site;</u></li> <li>• <u>no adverse impacts on the water quality of the River Avon SAC from surface water runoff during the construction and operational phases;</u></li> <li>• <u>measures to protect the integrity of the River Avon SAC, with particular regard to phosphate discharge into the River Avon and its tributaries. This will be informed by appropriate survey and impact assessment;</u></li> <li>• <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments; and</u></li> <li>• <u>provision made for transport network improvements necessary to accommodate the scale of development envisaged, as identified through a comprehensive transport assessment.</u></li> </ul> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>
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MM108	Paragraph 5.143	PC 105 and FMM 62	<p>Amend paragraph text as follows:</p> <p><u>Land north of Netherhampton Road is allocated for the development of approximately 100 dwellings on 5.6ha of land as shown on the Policies Map. It is reasonably well located with regard to services and facilities. The site is well contained in terms of visual impacts on the wider landscape. <del>The extent of possible flood risks areas will need to be carefully surveyed so that development avoids them. A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures.</del> The site is wholly located within Flood Zone 1, although its northern boundary is also the boundary to the adjacent area of land that lies within Flood Zone 2. Due to its size, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy to address issues of surface water flooding and to ensure that, given the site's proximity to the River Avon and to Flood Zone 2, there are no adverse impacts on the water quality of the River Avon SAC from surface water runoff during the construction and operational phases.</u></p>
MM109	Paragraph 5.144	PC 104 and FMM 63	<p>Amend paragraph as follows:</p> <p><del>The area is sensitive in terms of the setting to the Cathedral and views towards it. Open space along the southern boundary will maintain views of the Cathedral spire travelling east. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Proposals would need to provide for high quality, sustainable development that enhances an important approach to the City and provides links to nearby rights of way.</del></p> <p><u>Long views to the historic City of Salisbury and Salisbury Conservation Area including the spire of Salisbury Cathedral (Grade I listed) are available across the site from the A3094, and at closer range from within the site itself. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting. Development proposals would need to be sensitively designed to ensure that views of the Spire are not significantly compromised. Design and layout would also need to positively address the objectives of the City of Salisbury Conservation Area Appraisal and Management Plan to minimise harm. Proposals would therefore need to provide for high quality, sustainable development that enhances an important approach to the City and provides links to nearby rights of way. To achieve these outcomes, development proposals will meet the development principles set out in policy. In addition, the design and layout of a scheme should positively respect the significance of heritage assets. This could be achieved through several measures including, for example:</u></p> <ul style="list-style-type: none"> <li>• <u>the sensitive use of highway surfacing, materials, signage and lighting;</u></li> </ul>

			<ul style="list-style-type: none"> <li>• <u>the use of focal buildings and appropriate features to define the transition from open countryside to urban form; and</u></li> <li>• <u>a strategy for open space that could provide a heritage trail to link with existing footpaths in the area.</u></li> </ul>
MM110	Insert new paragraph after 5.144	FMM 64	<p>Insert new paragraph after 5.144 as follows:</p> <p><u>The site has been subject to archaeological assessment, geophysical survey and evaluation trenching, with archaeological interest shown to be present across the site. The archaeological potential of the site is demonstrably high. Development proposals will need to provide for a sensitive design and layout, that ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments.</u></p>
MM111	Paragraph 5.145	PC 106 and FMM 65	<p>Amend paragraph 5.145 as follows:</p> <p>...Funding contributions may also be sought where needed to increase capacity at local GP surgeries in the city, <u>in accordance with core policies of the Wiltshire Core Strategy. Transport assessment will be required to support any planning application and provision made for transport network improvements necessary to accommodate the scale of development.</u></p>
MM112	Insert new policy	FMM 66	<p>Insert new Policy H3.4 as follows:</p> <p><b><u>Land at Rowbarrow, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 100 dwellings;</u></b></li> <li>• <b><u>vehicular access from the Odstock Road to the west; and</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link into the existing network.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u></b></li> <li>• <b><u>a strong landscape framework that maintains and enhances the existing woodland belts, including open space provision in the southern part of the site and a green corridor extending along the southern boundary of the site from the existing beech tree shelterbelt;</u></b></li> </ul>

			<ul style="list-style-type: none"> <li>• <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design of the site so that surface water is controlled and does not exacerbate flooding off site; and</u></li> <li>• <u>provision made for transport network improvements necessary to accommodate the scale of development envisaged, as identified through a comprehensive transport assessment.</u></li> </ul> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>
MM113	Paragraph 5.147	PC 110	<p>Amend paragraph to read:</p> <p>Development will need to preserve the contribution made by the site to the setting and therefore the importance of the Woodbury Ancient Villages Scheduled Monument. If necessary, land will need to be set aside from development. <u>In line with national policy, Detailed design and layout will be guided by an assessment of heritage assets and their significance (including the contribution made by their setting). Heritage Impact Assessment.</u> Scheduled monument consent will be required. The site also has high archaeological potential.</p>
MM114	Para 5.148	PC 109	<p>Amend paragraph 5.148 to read:</p> <p>This is a sloping and quite prominent site. In combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk &amp; More Salisbury Depot. <u>This green corridor should include copses, groups of trees and individual specimen trees. The arrangement of any proposed development and open space on the site should provide a setting for public rights of way in the area and maintain their views of the Salisbury cathedral spire and this could be achieved through careful street alignment and locating open space in the southern part of the site. The sloping buffer of land on the northern edge of the site should be enhanced with tree planting and the landscape buffer along Rowbarrow (road) retained.</u></p>
MM115	Paragraph 5.149	FMM 67	<p>Amend last sentence of paragraph as follows:</p> <p><del>In addition,</del> <u>Appropriate contributions may also be sought where needed to increase capacity at local GP surgeries in the city, in accordance with core policies of the Wiltshire Core Strategy.</u></p>

MM116	Figure 5.22	PC 108	Amend Figure 5.22 (see end of Schedule - Map 'H3.4: Land at Rowbarrow, Salisbury')
MM117	Insert new site allocation and new policy after paragraph 5.149	FMM 68 and PC111	<p>After paragraph 5.149 add in new site allocation, as set out below:</p> <p>Insert new heading, <u>H3.5 The Yard, Hampton Park, Salisbury</u></p> <p>Insert new Policy H3.5 as follows:</p> <p><b><u>Land at The Yard, Hampton Park, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 14 dwellings; and</u></b></li> <li>• <b><u>vehicular access via the existing track onto Roman Road, with a new pedestrian and cycle access route provided through to Neal Close.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>landscaping strategy and infrastructure to ensure any development appears as a natural extension to Hampton Park. Hedgerows around the site should be maintained and enhanced where possible;</u></b></li> <li>• <b><u>identification and establishment of a suitable receptor site for the translocation of slow worms in the adjacent country park, or other suitable location, to be agreed with the Council's ecologist. Development shall not take place until the receptor site has been agreed and translocation has taken place to the satisfaction of the Council's ecologist;</u></b></li> <li>• <b><u>a Precautionary Working Method for birds, including barn owl; and</u></b></li> <li>• <b><u>measures to address contamination as informed by an assessment of the sites condition.</u></b></li> </ul> <p><b><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></b></p>
MM118	New supporting text	PC 111 and FMM 69	<p>Insert supporting text as follows:</p> <p><u>The Yard, Hampton Park is allocated for the development of approximately 14 dwellings on approximately 1.31 ha of land as shown on the Policies Map. The site lies adjacent to the settlement boundary and existing residential development and would deliver a relatively small number of dwellings to help contribute towards the overall remaining indicative housing requirement for Salisbury.</u></p>

			<p><u>The site has previously been used for agricultural storage purposes, is fairly flat, and comprises small parcels of rough grassland and a large disused agricultural storage building. Access to the site would be achieved via Neal Close.</u></p> <p><u>This site is within the Special Landscape Area and in a rural fringe setting, adjacent to the Country Park. Access to the Country Park should be provided from this site and a robust landscape strategy and infrastructure is required to allow any development to appear as a natural extension to Hampton Park.</u></p> <p><u>Hedgerows around the site have the potential to be of importance for bat commuting and should be maintained where possible. There is a high population of slow worms to be translocated off site, which may be within the adjacent Country Park or other suitable location. Given the potential scale of the translocation, any receptor site will need to provide suitable habitat conditions for the species. Translocation shall not occur until a suitable receptor site has been secured and a scheme for this work is agreed with the Council ecologist through the planning application process. No development shall take place until the translocation scheme has been implemented in full. Consideration also needs to be given to the site's potential use as a roost site for barn owls through a Precautionary Working Method for birds.</u></p> <p><u>As this site has previously been used for agricultural storage purposes, an assessment of the history and current condition of the site to determine the likelihood of the existence of contamination arising from previous uses should be carried to inform the planning application.</u></p>
MM119	New site plan	PC 111	Insert new site figure (see end of schedule – Map 'H3.5: The Yard, Salisbury')
MM120	Paragraph 5.150	FMM 70	<p>Add additional text to end of paragraph as follows:</p> <p>...Provision of housing at Durrington would positively contribute towards the delivery of this objective by ensuring the viability of existing services and creating demand for an improved local offer. <u>Developers of the allocated sites will be expected to contribute financially towards capacity improvements in local schools and health care provision in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM121	Add new paragraph after Paragraph 5.152	PC 113	<p>Add new paragraph after Paragraph 5.152 to read:</p> <p><u>Development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage. As such, a Nutrient Management Plan seeks to avoid the likelihood of adverse effects. Nonetheless, impacts are kept under review and this situation may change. For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC. Housing developers might consider how schemes can offset the additional phosphate loading resulting from new</u></p>

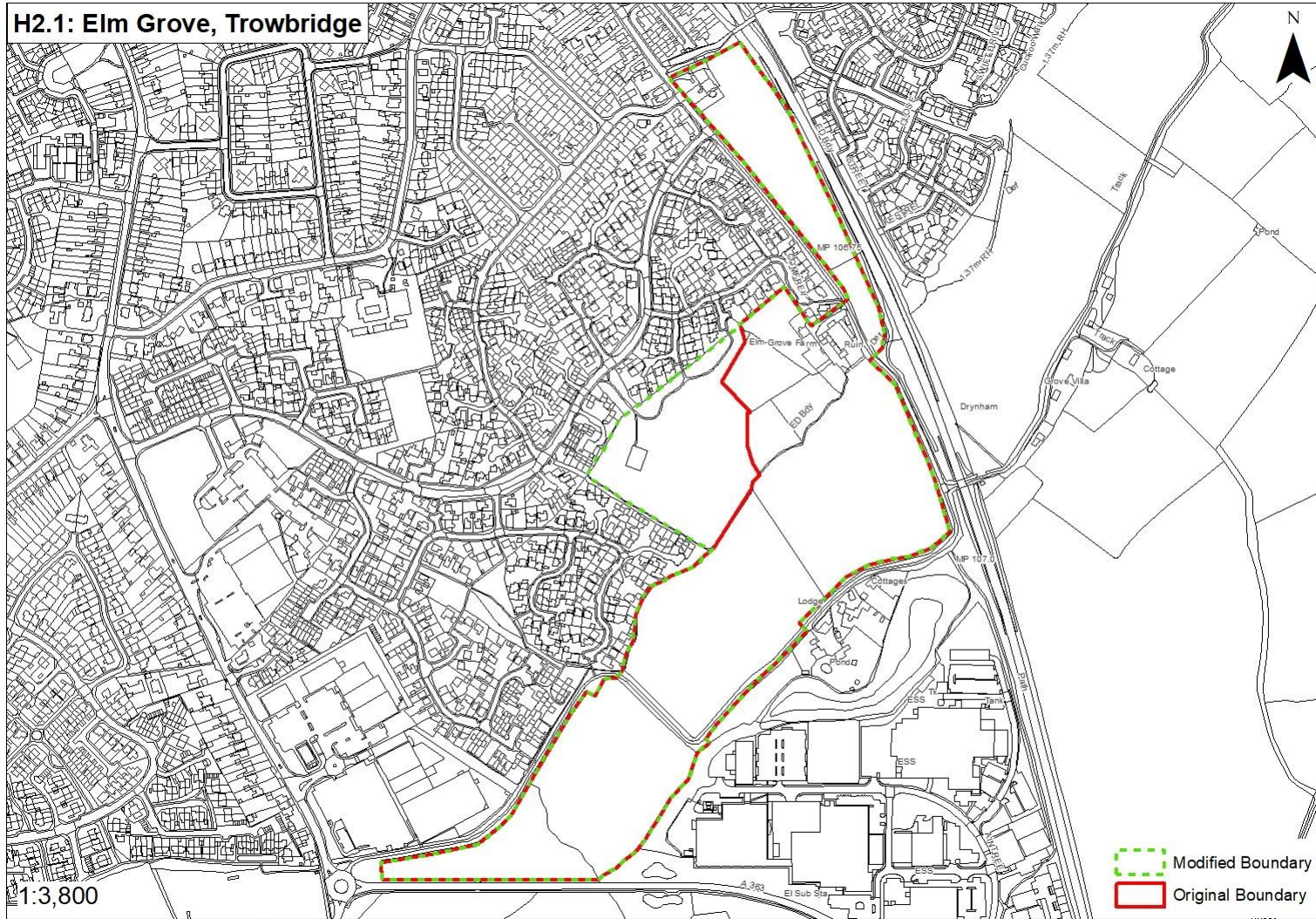


			<u>homes and specific measures will be set out in the annex to the Nutrient Management Plan.</u>
MM122	Insert new policy	FMM 71	<p>Insert new policy for H3.5 as follows:</p> <p><b><u>Land at Clover Lane, Durrington, as identified on the Policies Map, is allocated for development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 45 dwellings;</u></b></li> <li>• <b><u>vehicular access from Clover Lane;</u></b></li> <li>• <b><u>improvements to cycling and walking routes through the site to link into the existing network, including to High Street; and</u></b></li> <li>• <b><u>incorporation of any rights of access to the paddock and stables to the north of the site.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>sensitive design and layout, which ensures the significance of designated and non-designated heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u></b></li> <li>• <b><u>retention and enhancement of existing trees and hedgerows within extended green infrastructure corridors as part of wider landscaping to contribute to biodiversity, and provide appropriate screening to adjacent properties; and</u></b></li> <li>• <b><u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site.</u></b></li> </ul> <p><b><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></b></p>
MM123	Paragraph 5.154	FMM 72	<p>Add additional text to end of paragraph as follows:</p> <p>Vehicular access would be from the existing residential road network using Clover Lane. Pedestrian and cycle permeability through the site must be incorporated in the layout, including a direct link for pedestrian and cycle access through to the High St. <u>Any access rights from High Street through to the stables and paddock adjacent to the site should be incorporated into the design and layout of the site.</u></p>

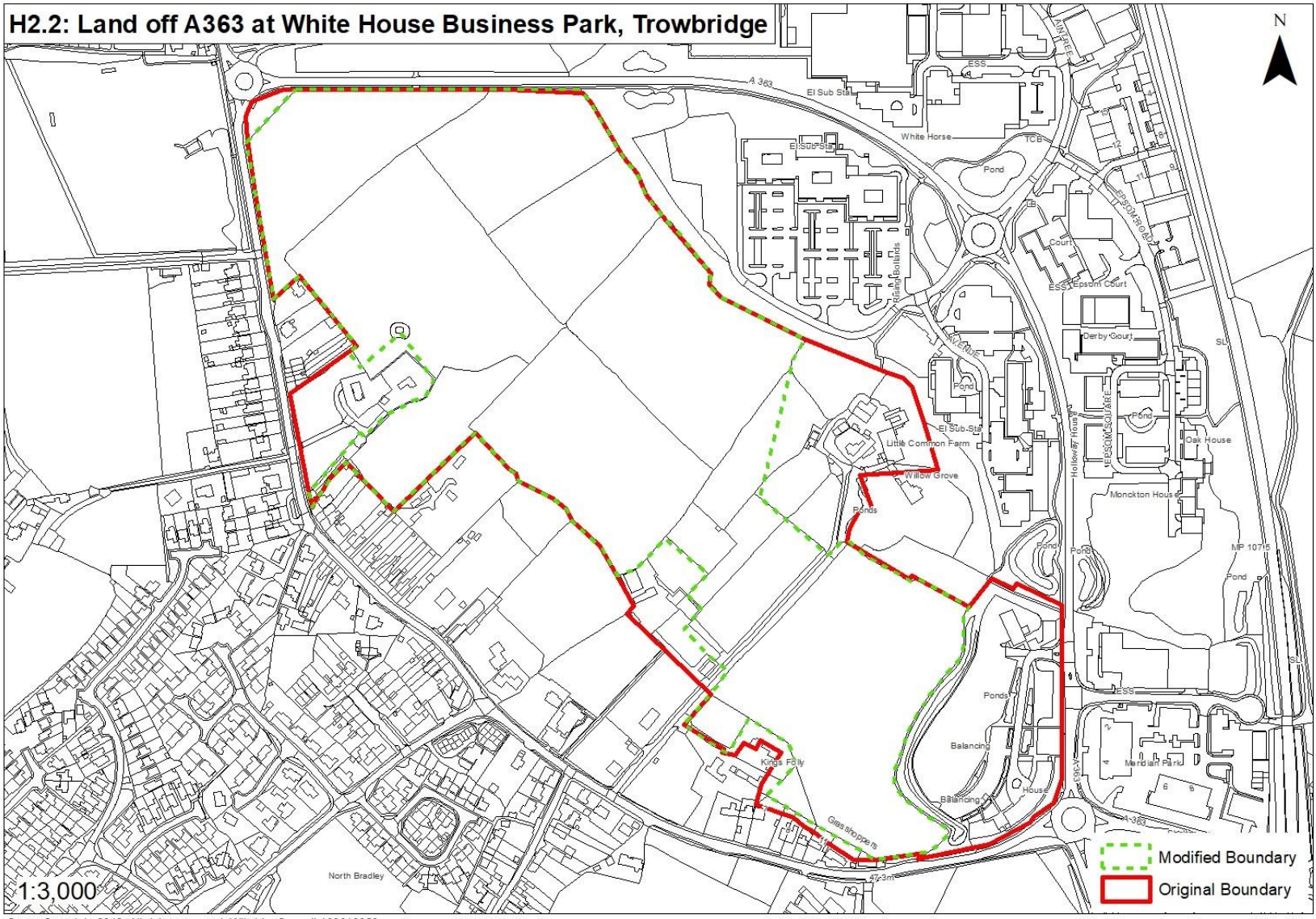
MM124	Paragraph 5.155	PC 115 and FMM 73	<p>Amend supporting text as follows:</p> <p>The site lies adjacent to the Durrington Conservation Area <del>to the east</del> and a number of Listed Buildings (<u>Durrington Manor, Grade II listed and The Red House, Grade II listed</u>) and <u>undesigned heritage assets (Manor Cottage and important cobb walls)</u>. Detailed design and layout would need to preserve or enhance the character <u>or appearance</u> of the Conservation Area and this is particularly important for the eastern portion of the site. Development should minimise <del>the potential for</del> harm to the significance of Listed Buildings and the Conservation Area <u>and should be designed in a sensitive and appropriate manner taking into consideration non-designated heritage assets, designated assets and objectives set out in the Durrington Conservation Area Appraisal. The cobb wall at the eastern boundary of the site will need careful consideration within the proposed layout. In line with national policy, detailed design and layout will be guided by an assessment of heritage assets and their significance (including the contribution made by their setting). <del>Informed by a Heritage Impact Assessment these considerations should be resolved through the detailed design and layout of the scheme.</del></u></p>
MM125	Paragraph 5.156	PC 116 and FMM 74	<p>Amend paragraph as follows:</p> <p>There is a tree belt adjacent to the northern boundary of the site which is protected by a group Tree Preservation Order and there are substantial hedgerows to the western boundaries <u>and trees adjacent to the southern boundary at its eastern end</u>. Mature trees and hedgerows must be retained as important features of the site, and additional green infrastructure should be incorporated to enhance and protect these <u>existing features both within and adjacent to the site</u> in order to <del>ensure a soft edge to the open countryside</del> <u>maintain the role of the trees in contributing to biodiversity and the character of this part of Durrington</u> <del>ensure a soft edge to the open countryside and to ensure appropriate screening between the new development and adjacent residential development and allotments. A layout can link into open space to the south east of the site.</del></p> <p><u>Considering the size of the site and history of surface water flooding on site and in the surrounding area, a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design will be required. In addition, as the site lies within Groundwater Protection Zone 1 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy.</u></p>
MM126	Figure 5.23	PC 114	Amend Figure 5.23 (see end of schedule – Map 'H3.5: Clover Lane, Durrington')
MM127	Insert new policy	FMM 75	Insert new policy as follows:

	Figure 5.24		<p><b><u>Land at Larkhill Road, Durrington, as identified on the Policies Map, is allocated for residential development comprising the following elements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>approximately 15 dwellings.</u></b></li> </ul> <p><b><u>Development will be subject to the following requirements:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>sensitive design and layout, which ensures the archaeological potential of the site is addressed through the planning application process. This shall be informed by appropriate archaeological assessment; and</u></b></li> <li>• <b><u>layout and design in line with character and pattern of frontage development on Larkhill Road, with gardens or open space to the south of the site serving as a soft edge to the countryside.</u></b></li> </ul> <p><b><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></b></p>
MM128	Paragraph 5.157	PC118	<p>Add new sentences to end of paragraph:</p> <p><u>As the site lies within Groundwater Protection Zone 1 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy.</u></p>
MM129	New para after 5.158	FMM 76	<p>Insert new paragraph after paragraph 5.158:</p> <p><u>Due to the location in close proximity to the World Heritage Site, including Durrington Walls and Woodhenge, archaeological assessment will be required and must inform development proposals and any necessary mitigation.</u></p>

# Inset Map Amendments

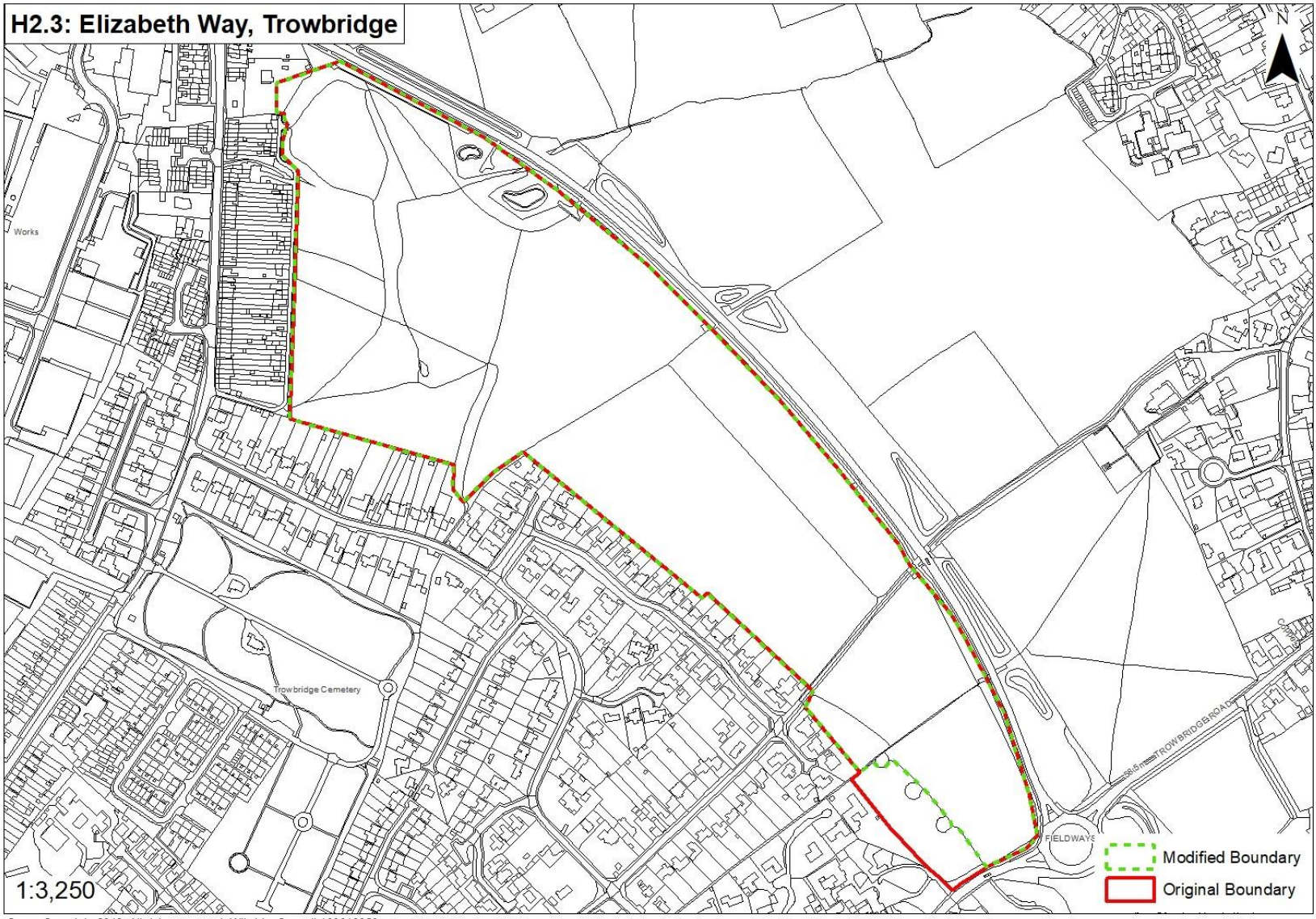


## H2.2: Land off A363 at White House Business Park, Trowbridge



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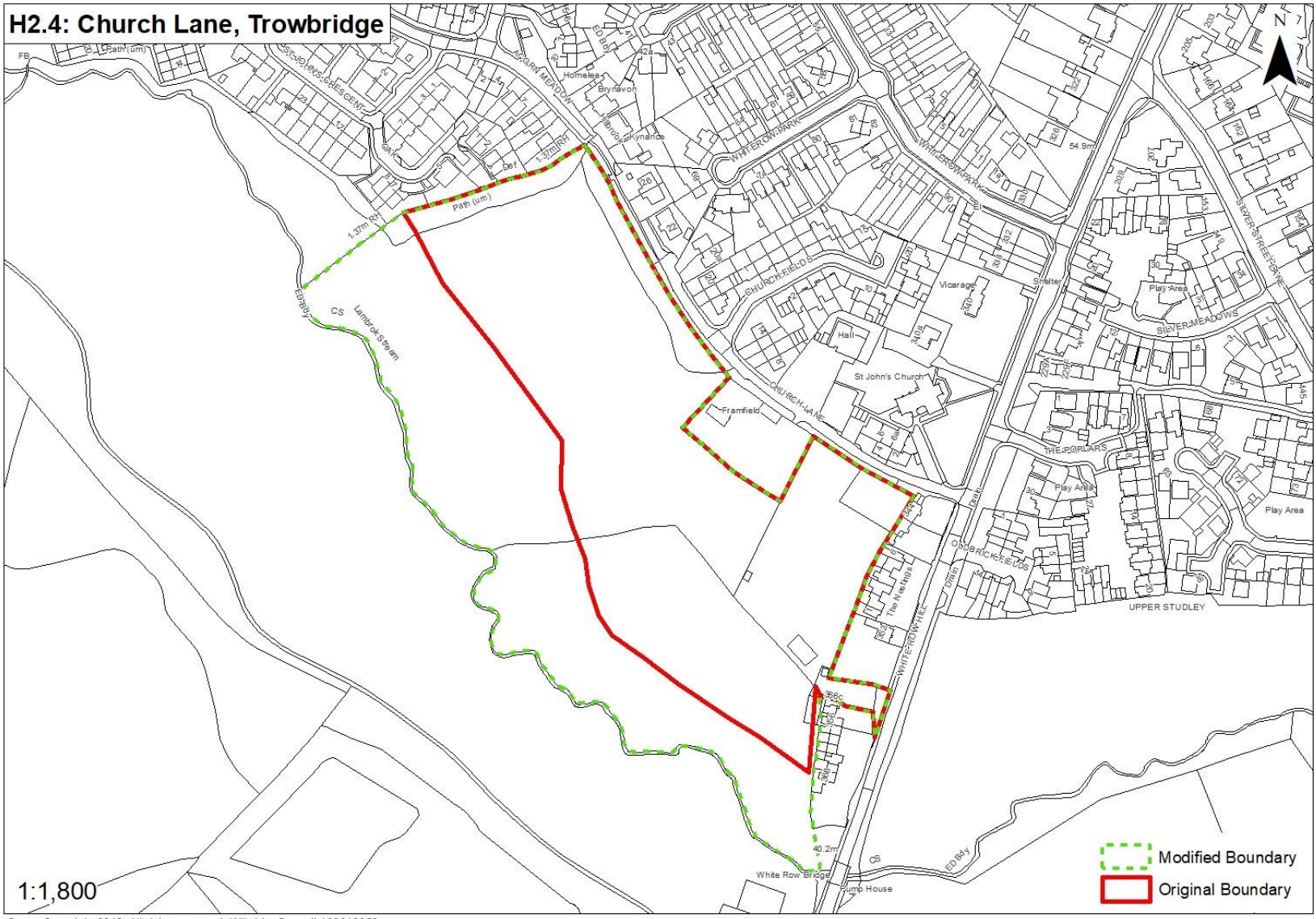
### H2.3: Elizabeth Way, Trowbridge



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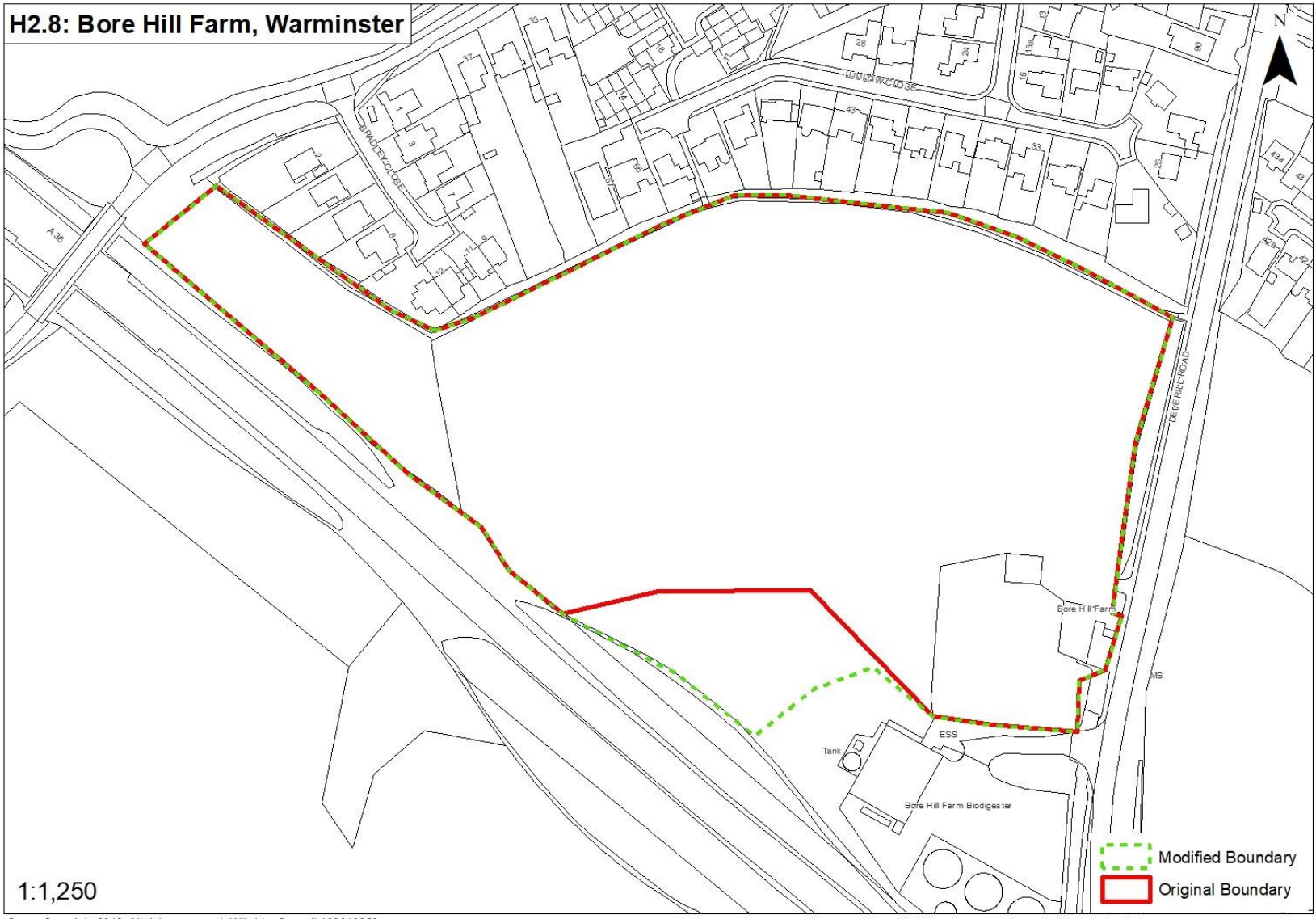
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## H2.4: Church Lane, Trowbridge



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**H2.8: Bore Hill Farm, Warminster**



1:1,250

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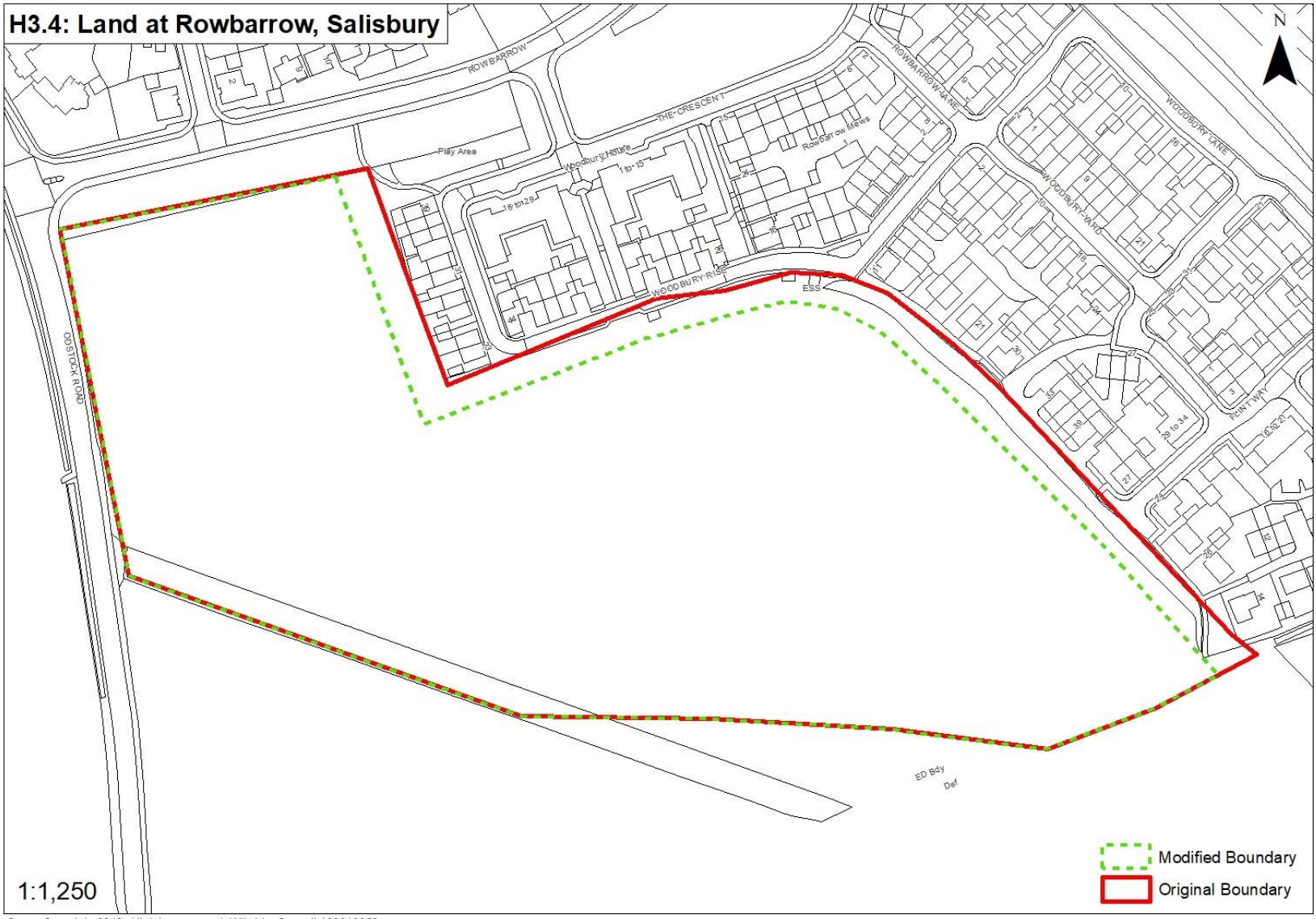


H2.12: East of Farrells Field, Yatton Keynell



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### H3.4: Land at Rowbarrow, Salisbury

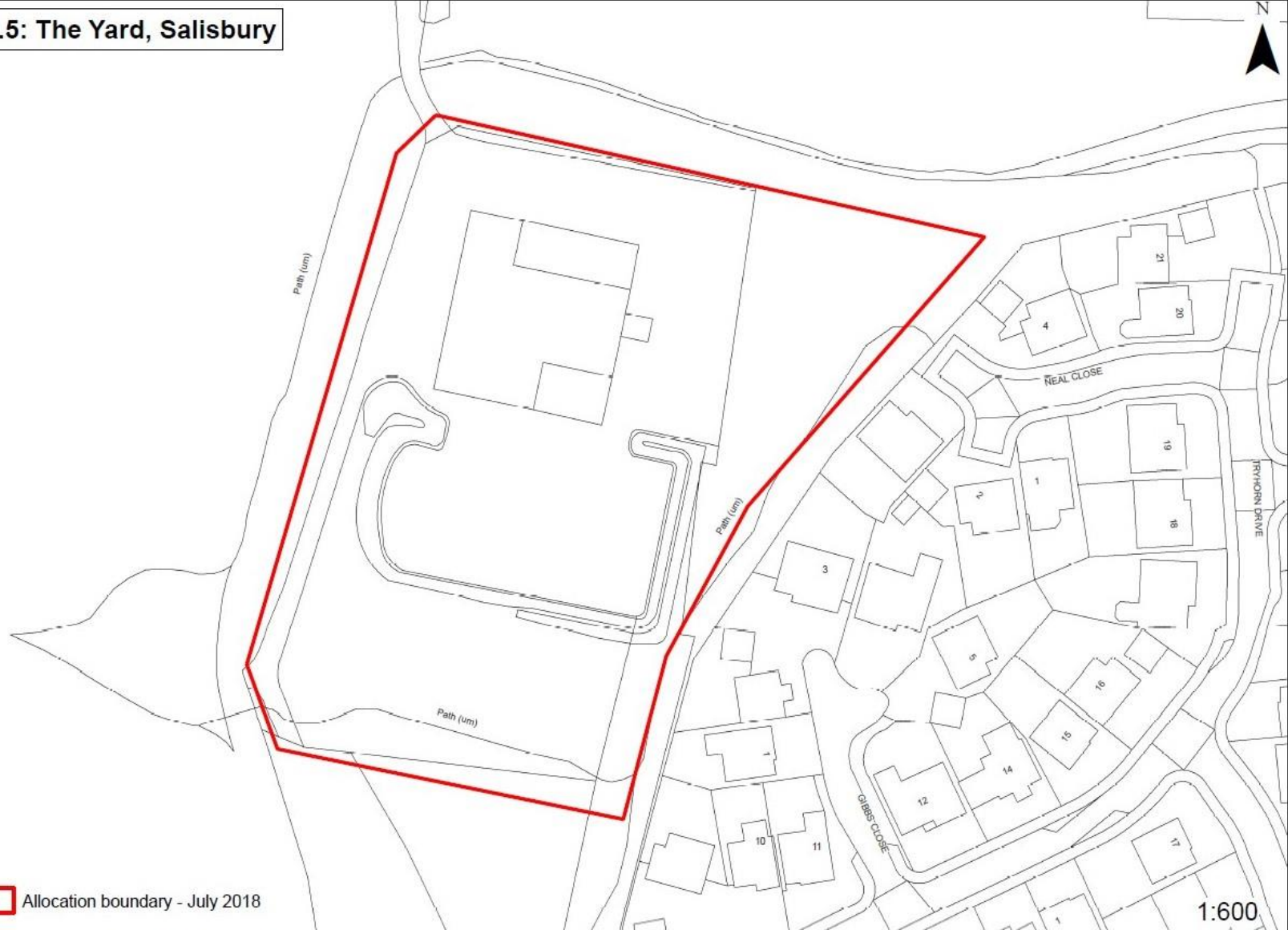



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Modified Boundary  
Original Boundary

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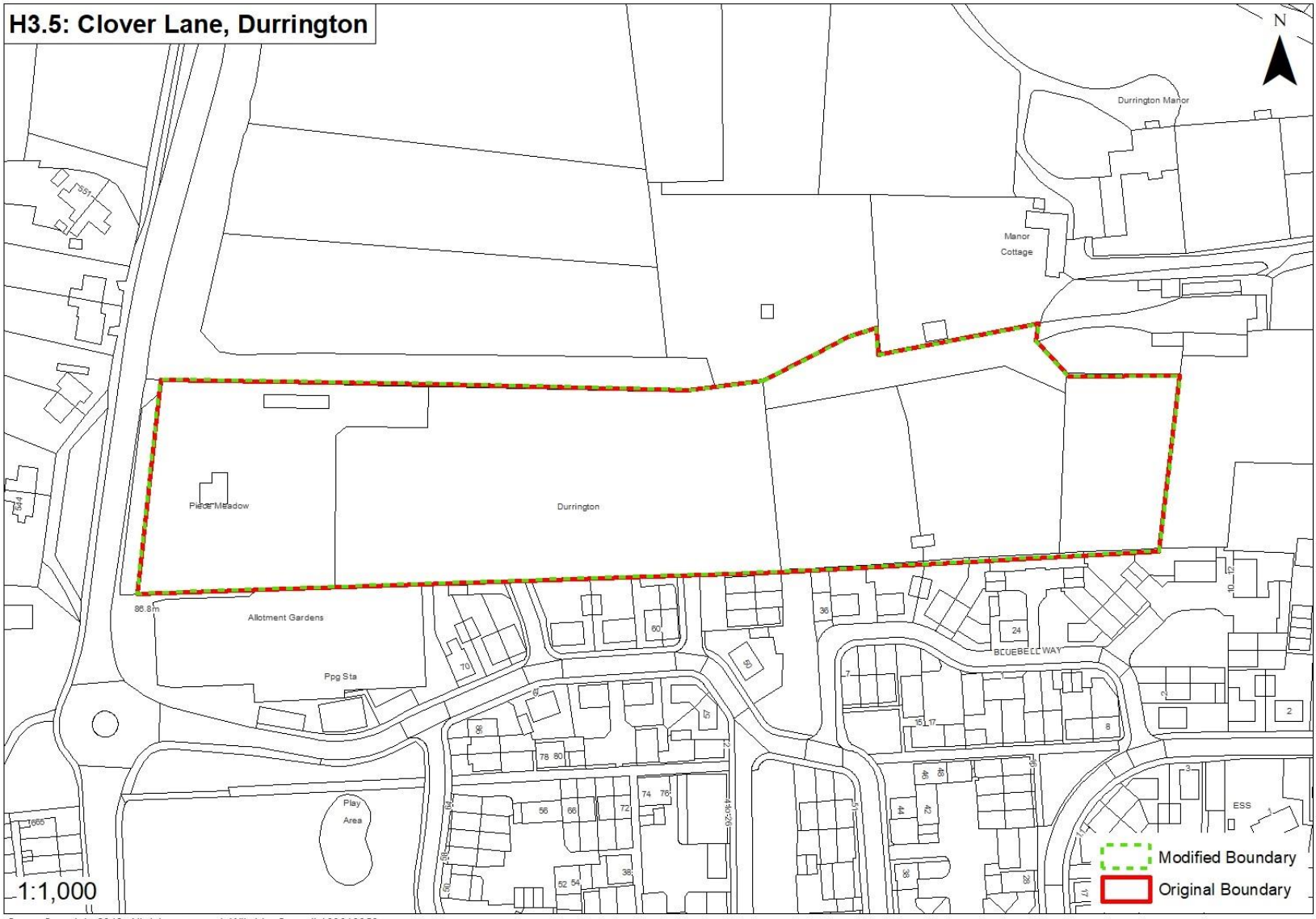
**H3.5: The Yard, Salisbury**



 Allocation boundary - July 2018

1:600

### H3.5: Clover Lane, Durrington



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