

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H2.7 East of The Dene, Warminster

PS/M3/37

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Matter 3: Housing Site Allocations H2.7 East of The Dene, Warminster

Issue 5: Are the proposed sites justified, effective and consistent with national policy?

Issue 5.1 - Does the plan provide sufficient detail on form, scale, access and quantity of development for each site?

1. Yes. Policies H2 and H2.7 of the Wiltshire Housing Site Allocations Plan (WHSAP) Submission Document (WHSAP.01.01¹) and supporting text, incorporating the Council's Schedule of Proposed Changes (EXAM.01.01²) when read in conjunction with the text set out in Chapter 5 of the Plan (paragraphs 5.1 to 5.12) provide sufficient detail. The text in Chapter 5 clarifies that the policies of the Wiltshire Core Strategy (WCO.01³) will also apply in considering the development of the site. When taken together with the Core Strategy, the Council considers the Plan provides sufficient detail on form, scale, access and quantity of development.
2. Policy H2.7 of the WHSAP (WHSAP.01.01 and EXAM.01.01) and its supporting text (paragraphs 5.88 to 5.92) provides sufficient certainty and clarity for the user of the Plan to guide the development that is expected to be delivered on the site.
3. The quantity of development to be delivered is approximately 100 dwellings, and vehicular access is to be taken from Boreham Road. Further consideration of access arrangements would be undertaken through the planning application process. The policy directs the form of development to take place predominantly within the northern part of the site, requiring 2ha of undeveloped land to be located in the south west part of the site.
4. The Council considers that the level of detail provided within the WHSAP is sufficient, given that there are already policies concerning appropriate form, scale and access set out in the Wiltshire Core Strategy (WCO.01) that will be used to determine future planning applications on the site.

Issue 5.2 - Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

5. The 2012 Strategic Housing Land Availability Assessment (SHLAA) (SHLAA2012.17⁴) estimated a site capacity of 164 dwellings for SHLAA site 603. This was based on the SHLAA Methodology (SHELAA.22⁵), using 30 dwellings per hectare and applying a multiplier to reduce the developable area to allow for non-housing uses. This formed a starting point for assessment of the site.
6. Stage 2 of the WHSAP site assessment process then considered whether exclusionary criteria (such as Flood Zones 2/3) should result in a reduction of the

¹ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

² [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - Sept 2018 (Part 1/46)

³ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

⁴ [\[SHLAA2012.17\]](#) SHLAA 2012 - Appendix 3 - Warminster

⁵ [\[SHELAA 22\]](#) SHLAA Methodology - Sept 2011

- SHLAA site capacity. In the case of H2.7, the site capacity was not reduced (CATP/18a⁶, Table D.3) as there were no exclusionary criteria applicable to the site.
7. At subsequent Stages 3 and 4 of the assessment process, the site area and amount of development proposed was reduced due to constraints identified through the Sustainability Appraisal and Heritage Impact Assessment, summarised in the Warminster CATP (CATP18a) (Appendix F, p90) and subsequent assessment (Appendix G, p127). For the purpose of defining a site allocation boundary, the SHLAA site boundary was amended to exclude land on the eastern side in order to retain separation on the edge of Warminster and to safeguard the significance of heritage assets, including the Grade II Listed Bishopstrow House Hotel and Bishopstrow Conservation Area. The site capacity was also reduced, as a single point of access would limit the scale and layout of any subsequent development to approximately 100 dwellings, which is considered to an achievable quantum of development to be located predominantly in the north-west part of the site.
 8. Infrastructure requirements that are justified and necessary to deliver the site are identified at paragraph 5.92 of the WHSAP (WHSAP.01.01⁷). Other requirements will be determined through detailed design and the planning application process.

Issue 5.3 - What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated:

i. biodiversity, in particular but not restricted to European protected habitats and species

9. Wiltshire Council considers that any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
10. The Sustainability Appraisal (SA) for this site (SA.01A.11⁸) was informed by a settlement level Habitats Regulation Assessment (HRA.01⁹) which concluded that the relationship of the site with the River Avon Special Area of Conservation (SAC) and Salisbury Plain Special Protection Area (SPA) could contribute to in-combination effects and that appropriate assessment would be required. Subsequently the council produced an Addendum under the Habitats Regulations (HRA. 02¹⁰), and a further Addendum (HRA.02a¹¹) to support the council's Schedule of Proposed Changes, which provided the further assessment that was required for both matters.
11. Regarding the likely significant effects of phosphate discharge into the River Avon SAC, it was agreed that additional wording, to be agreed by the Environment Agency and Natural England should be inserted into the Plan to provide greater certainty over the need to provide for phosphate neutral development. This has been agreed through a Memorandum of Understanding (HRA.03¹²) which has

⁶ [CATP.18a] Warminster Community Area Topic Paper - Updated September 2018

⁷ [WHSAP.01.01] Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁸ [SA.01.A.11] Sustainability Appraisal Report, Annex 1 A11 Warminster

⁹ [HRA.01] Habitats Regulations Assessment - Pre-submission draft plan, June 2017

¹⁰ [HRA.02] Addendum to the HRA, May 2018

¹¹ [HRA.02.a] Addendum to the HRA, May 2018 (Factual Update - September 2018)

¹² [HRA.03] Memorandum of Understanding - River Avon Special Area of Conservation Phosphate Neutral Development - Interim Mitigation

informed Proposed Change 75 (PC75) to paragraph 5.87 of the WHSAP (EXAM.01.01¹³). Wiltshire Council considers that the potential impacts are addressed through the supporting text of the Plan at paragraph 5.87 (as amended). This is discussed in more detail the council's response to Issue 5.11.

12. Regarding the likely significant effects of visitor pressure on the Salisbury Plain SPA, the Addendum under the Habitats Regulations (HRA.02¹⁴) confirms that the council has updated the HRA and Mitigation Strategy for Salisbury Plain SPA (HRA.04¹⁵) to take account of the latest visitor survey results and stone curlew monitoring, and there are no recommendations for changes to policies or supporting text in the Plan.
13. Biodiversity is assessed on p.54-56 of the SA – Annex 1: A.11 Warminster Market Town (SA.01A.11¹⁶). The outcome of the SA for the site is summarised in the Warminster CATP (CATP.18a¹⁷) at Appendix F, table F.9; and at Appendix G.
14. The assessment notes that there are trees and significant landscape features along site boundaries which provide important wildlife corridors and should be retained, protected and, wherever practicable, bolstered to improve habitat connectivity. It is considered that the matter falls within the scope of Core Policy 50 of the WCS (WCO.01¹⁸), and it is expected that this would be addressed through the submission of an ecological assessment as part of any future planning application.

ii. green infrastructure and agricultural land

15. The Council considers that preservation of green infrastructure and agricultural land have been adequately considered through the site selection process, and that neither matter presents a reason to preclude development on this site.
16. Green infrastructure and agricultural land are assessed through the SA – Annex 1: Warminster Market Town (SA.01A.11). The SA states that development of the site offers potential to deliver green infrastructure through provision of open space, connections to and retention of existing footpath networks and green corridors. This is supported by the existing green infrastructure requirements set out in Core Policy 52 of the WCS (WCO.01). In addition, Policy H2.7 includes a requirement to retain 2ha undeveloped land within the south west part of the site to preserve the openness of the setting for nearby heritage assets. This land may remain in agricultural use, or be developed as either formal or informal open space.
17. In relation to agricultural land, the site is comprised of land classified as Grade 3a and 3b agricultural land. While development in this location would in part result in the loss of land classed as best and most versatile land, the loss would be a relatively small parcel of land. The 2ha land that is to be set within the south west part of the site falls within Grade 3a classification, and therefore could be retained in agricultural use. The Council considers that a minor loss of best and most versatile

¹³ [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - Sept 2018 (Part 1/46)

¹⁴ [\[HRA.02\]](#) Addendum to the HRA, May 2018

¹⁵ [\[HRA.04\]](#) HRA and Mitigation Strategy for Salisbury Plain SPA in Relation to Recreational Pressure from Development

¹⁶ [\[SA.01.A.11\]](#) Sustainability Appraisal Report, Annex 1 A11 Warminster

¹⁷ [\[CATP.18a\]](#) Warminster Community Area Topic Paper - Updated September 2018

¹⁸ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

land can be justified by the benefits of developing housing on the site.

iii. landscape quality and character

18. The Council considers that protection of landscape quality and character has been central to the site assessment process and led to the proposed allocation of this site.
19. Landscape matters are assessed through the SA – Annex 1: Warminster Market Town (SA.01A.11¹⁹), and through subsequent consideration at Stage 4 of the site assessment process, set out in the Warminster CATP, Appendix G (CATP.18a²⁰). It is also assessed through the Stage 4a Site Landscape Assessment.
20. The site assessment indicates that SHLAA site 603 as a whole provides an important visual gap between Warminster and Bishopstrow House, and for this reason it was considered that the site boundary should be amended, to allow for a clear area of separation. Assessment of the site concluded that the northwest part of the site would be most appropriate for development from a landscape and heritage perspective, whereas land in the southern part of the site should be retained for agricultural land or formal/informal public open space in order to preserve the setting of Bishopstrow House Hotel. Therefore, Policy H2.7 and supporting text require that development is to be focussed on the north west part of the site together with an undeveloped zone of 2ha in the south west part of the site. This would be supplemented by additional planting to provide a soft urban edge and filter views of the site from surrounding areas, including Bishopstrow House Hotel and Battlesbury Hill Fort Scheduled Monument (SM). This is reflected in paragraphs 5.88 and 5.89 of the WHSAP (WHSAP.01.01²¹ and EXAM.01.01²²).

iv. heritage assets

21. The Council acknowledges that there are complexities surrounding the designated and non-designated heritage context of this site. Special regard has been given to the significance of these heritage assets and their settings throughout the site assessment process. Great weight has been applied to conserving and enhancing the assets and their setting. It is considered that the adjustments to the site area and reduction in site capacity, together with the specific policy requirements mean that the site can be brought forward in a manner that is acceptable from a historic environment perspective.
22. Heritage matters are assessed through the SA – Annex 1: Warminster Market Town (SA.01A.11), and through subsequent consideration at Stage 4 of the site assessment process, set out in the Warminster CATP, Appendix G (CATP.18a). Site assessment suggested several measures necessary to help safeguard the significance of heritage assets, and these are taken forward by the Plan. The site assessment indicates that there are a number of heritage assets that will need to be considered through the development of the site. Heritage assets in the vicinity of the site include Bishopstrow House Hotel, Bishopstrow Conservation Area, and Battlesbury Hill Fort SM.

¹⁹ [\[SA.01.A.11\]](#) Sustainability Appraisal Report, Annex 1 A11 Warminster

²⁰ [\[CATP.18a\]](#) Warminster Community Area Topic Paper - Updated September 2018

²¹ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

²² [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - Sept 2018 (Part 1/46)

23. The heritage context of the site has informed the policy and supporting text wording at paragraphs 5.89-5.92 (WHSAP.01.01²³ and EXAM.01.01²⁴). This includes provisions to ensure that the south west part of the site remains undeveloped; ensuring that the design and layout of the site gives great weight to conserving the significance of heritage assets to minimise harm; ensuring a sensitively designed access, and that necessary loss of any of the high wall fronting Boreham Road to facilitate access to the site, is kept to a minimum and is mitigated; and ensuring that a masterplanned and sensitively designed scheme is brought forward, informed by a the Council's Heritage Impact Assessment (WHSAP.05²⁵) and further detailed site specific assessments required to support the planning application.
24. The Council consider that the policy and supporting text, in combination with national policy guidance and the framework set by Core Policy 58 of the WCS (WCO.01²⁶) can ensure that the allocation is brought forward resulting in less than substantial harm to the heritage setting, justified by the clear benefits of delivering a significant number of homes at Warminster.

v. strategic and local infrastructure including transport

25. There are no critical infrastructure requirements needed to enable delivery of this site. Wiltshire Council are of the view that the policy, its supporting text, and the requirements set by the WCS (WCO.01) and national guidance is sufficient to ensure that the site can come forward with due regard to strategic and local infrastructure needs. Impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
26. The requirement to consider strategic and local infrastructure requirements is set by Core Policy 3 of the WCS (WCO.01). setting out key infrastructure that development will contribute towards over the WCS plan period. The council considers that Core Policy 3 provides a catch all approach to ensuring that development sites will provide for essential and place-shaping infrastructure that is necessary to support it.
27. In addition, strategic and local infrastructure matters are specifically assessed through the SA – Annex 1: Warminster Market Town (SA.01A.11²⁷) and through subsequent consideration at Stage 4 of the site assessment process, set out in the Warminster CATP, Appendix G (CATP.18a²⁸).
28. The SA indicates that GP surgeries in Warminster have capacity issues, and that mitigation would be required to support additional patient demand. This specific infrastructure issue is considered at paragraph 5.92 of the WHSAP (WHSAP.01.01), which confirms that funding contributions may be sought where needed to increase capacity at local GP surgeries at the town.
29. In relation to education, the local primary school could be expanded on its existing site if sufficient demand was demonstrated. Evidence indicates that there is no capacity to expand Kingdown Secondary School on its existing site and no immediate prospect of an expansion site being secured and delivered elsewhere. Education infrastructure is considered at paragraph 5.92 of the WHSAP

²³ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

²⁴ [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - Sept 2018 (Part 1/46)

²⁵ [\[WHSAP 05\]](#) Heritage Impact Assessment, March 2018

²⁶ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

²⁷ [\[SA.01.A.11\]](#) Sustainability Appraisal Report, Annex 1 A11 Warminster

²⁸ [\[CATP.18a\]](#) Warminster Community Area Topic Paper - Updated September 2018

(WHSAP.01.01²⁹), which confirms that funding contributions may be sought where needed to fund necessary local school capacity.

vi. the efficient operation of the transport network, highway safety

30. Transport network and highways safety matters are assessed through the SA – Annex 1: Warminster Market Town (SA.01A.11³⁰) and through subsequent consideration at Stage 4 of the site assessment process, set out in the Warminster CATP, Appendix G (CATP.18a³¹).
31. The SA explains that the site is in an edge of town location. It is not considered to be within walking distance of services and facilities in the town, although is within a reasonable cycling distance. Detailed design will connect the site to existing safe cycling routes. There are bus stops close to the site at Boreham Road and Woodcock Road serving a reasonably regular route (approx. every half hour), and therefore future residents could make sustainable transport choices that would support the efficient operation of the transport network.
32. The Stage 4 assessment of the site indicates that direct vehicular access to the site from Boreham Road is achievable. This would require removal of part of a wall fronting Boreham Road. Reliance on one point of access would limit the scale of any subsequent development to approximately 100 dwellings.
33. During the Regulation 22 consultation the Council received advice from Highways England that there would be a need to address potential unknown traffic impacts on the A36 that may be caused by the cumulative impact of numerous site allocations (including those at Warminster). PC74 of the Schedule of Proposed Changes (EXAM.01.01³²) addresses this, and it is a requirement applicable to all proposed allocations at Warminster that development proposals must consider and address any direct or indirect cumulative impacts on the A36.

vii. air and water quality, noise pollution, odours, land stability, groundwater and flood risk

34. Air and water quality, noise pollution, odour impact, land stability, groundwater and flood risk are assessed through the SA – Annex 1: Warminster Market Town (SA.01A.11) and through subsequent consideration at Stage 4 of the site assessment process, set out in the Warminster CATP, Appendix G (CATP.18a).
35. In relation to water quality, and the potential for phosphate discharge into the River Avon SAC, additional wording has been inserted into the Plan to provide greater certainty over the need to provide for phosphate neutral development. This has been agreed through a Memorandum of Understanding (HRA.03³³) which has informed a proposed change (PC75) to paragraph 5.87 of the WHSAP (EXAM.01.01). Wiltshire Council considers that the potential impacts are addressed through the supporting text of the Plan at paragraph 5.87 (as amended). This is discussed in more detail the council's response to Issue 5.11.

²⁹ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

³⁰ [\[SA.01.A.11\]](#) Sustainability Appraisal Report, Annex 1 A11 Warminster

³¹ [\[CATP.18a\]](#) Warminster Community Area Topic Paper - Updated September 2018

³² [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - Sept 2018 (Part 1/46)

³³ [\[HRA.03\]](#) Memorandum of Understanding - River Avon Special Area of Conservation Phosphate Neutral Development - Interim Mitigation

36. Regarding air quality, the SA (SA.01A.11³⁴) concludes that local air quality is likely to be affected through increases in local commuter traffic. The council considers that mitigation measures in line with national and local plan policy, including Core Policy 55 of the WCS (WCO.01³⁵), are achievable on this site.
37. With reference to noise, the SA states that development of the site may lead to some short and long term impacts through construction and occupation. The council consider that mitigation measures to limit such impacts are achievable in line with national planning policy, local plan policy and advice from relevant bodies. There are no known likely sources of odour pollution within or close to the site.
38. In light of the requirements of the National Planning Policy Framework (NPP.01A³⁶) in relation to land stability, there are no known issues of concern in relation to this site.
39. Regarding ground water and flood risk, the site is located in Flood Zone 1, although a small part of the site is at risk of surface water flooding. An assessment of existing capacity within existing water infrastructure systems would need to be undertaken to support and inform any subsequent planning application. Where necessary, additional infrastructure capacity (e.g. a new pumping station) would need to be provided through agreement with the relevant water utilities company, Lead Local Flood Authority and Environment Agency. Paragraph 5.86 of the WHSAP (WHSAP.01.01³⁷) requires that developments be supported by a comprehensive Drainage Strategy to ensure that development will result in improved drainage conditions. Sufficient land will also need to be set aside for surface water management measures. Paragraph 5.91 of the WHSAP (EXAM.01.01³⁸), as amended by PC78, goes on to specify that development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change).

viii. open space, recreational facilities and public rights of way

40. Open space, recreational facilities and public rights of way are assessed through the SA – Annex 1: Warminster Market Town (SA.01A.11).
41. The SA states that development of the site offers potential to deliver green infrastructure through provision of open space, connections to and retention of existing footpath networks and green corridors. Paragraph 5.89 of the WHSAP (EXAM.01.01) explains how the south west part of the site could remain in agricultural use or be delivered as either formal or informal open space. Paragraph 5.90 of the WHSAP (EXAM.01.01) also requires secondary access to the site to be provided for cyclists and pedestrians via The Dene and improvements to be made to footpath WARM40.

Issue 5.4 - In relation to the above, does the plan contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development?

42. Wiltshire Council considers that the WHSAP contains effective safeguards or mitigation measures necessary to achieve an acceptable form of development.

³⁴ [\[SA.01.A.11\]](#) Sustainability Appraisal Report, Annex 1 A11 Warminster

³⁵ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

³⁶ [\[NPP.01A\]](#) National Planning Policy Framework (NPPF), March 2012

³⁷ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

³⁸ [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - Sept 2018 (Part 1/46)

43. Policy H2.7 and its supporting text including proposed changes provides contextual detail which will guide future developers and decision makers, and inform mitigation measures that may be required. The requirement for a master plan informed by detailed assessments e.g. on ecology, landscape and heritage will help ensure that the site is developed in an acceptable form. The policy provides clear principles and a framework for the site's development, and masterplanning of the site will take this forward in more detail.
44. Paragraphs 5.1 to 5.12 explain how the site will be developed in accordance with existing policies set out in the WCS (WCO.01³⁹), such that there are already effective safeguards to ensuring acceptable forms of development are to be delivered.

Issue 5.5 - What infrastructure is critical to the delivery of each site? Where contributions are specified, are they necessary and justified by the evidence base? Is the plan sufficiently clear on how and when infrastructure provision will be required?

45. S106 contributions will be sought through the planning application process to address added pressures on local services. This will contribute towards delivering additional capacity, where necessary. There is no critical infrastructure necessary to enable the development to proceed.

Issue 5.6 - Is the site in an accessible location with good access to everyday facilities by a range of means of transport? Does the plan provide an adequate basis to address any areas of deficiency?

46. The proposed allocation site is assessed through the SA – Annex 1: Warminster Market Town (SA.01A.11⁴⁰) and through subsequent consideration at Stage 4 of the site assessment process, set out in the Warminster CATP, Appendix G (CATP.18a⁴¹). The site assessments explain that the site is in an edge of town location. The site is not considered to be within walking distance of services and facilities in the town, although is within a reasonable cycling distance to essential facilities within the town. The site also benefits from direct connection to public rights of way networks. While residents are likely to use private vehicles, there are opportunities through the planning application stages to ensure that development of the site incorporates infrastructure to improve cycling opportunities (such as garages, sheds and secure bike stands) in accordance with Core Policy 60 of the WCS (WCO.01). In addition, there are bus stops close to the site at Boreham Road and Woodcock Road serving a reasonably regular route, and therefore future residents could make sustainable transport choices that would support the efficient operation of the transport network.

Issue 5.7 - In cases where allocations do not have specific policies, is the reliance on supporting text likely to be an effective means of delivering the Council's requirements for each site? What is the justification for some sites having specific policies and some not?

³⁹ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

⁴⁰ [\[SA.01.A.11\]](#) Sustainability Appraisal Report, Annex 1 A11 Warminster

⁴¹ [\[CATP.18a\]](#) Warminster Community Area Topic Paper - Updated September 2018

47. The submission version of the WHSAP (WHSAP.01.01⁴²) explains at paragraph 5.12 that allocations are proposed at some settlements that involve a mix of uses or site specific complexities and where it is more appropriate for development to be guided by a master plan approach, as opposed to detailed matters being addressed through policy criteria. There are five sites, of which this site is one, that have been identified as requiring a master plan.
48. The remaining sites are allocated by Policies H2 and H3. Due to their less complex nature, these sites were not considered to require a master planned approach, and thus do not have a specific policy. The supporting text to the allocated sites provides future developers and decision makers with important contextual information regarding matters that will need to be addressed through the planning application process. Indeed, as set out Chapter 5 of the WHSAP (WHSAP.01.01), the Council anticipates that development proposals relating to all allocations will be guided by relevant policies of the Wiltshire Core Strategy (WCO.01⁴³).
49. The Council considers that the specific requirements for each allocation within the WHSAP can effectively be delivered as drafted through a combination of policies and supporting text that will all be read in conjunction with the WCS.

Issue 5.8 - Is the development proposed for each site deliverable in the timescales envisaged?

50. The proposed allocation is formed by part of a site identified within Wiltshire Council's SHLAA (SHLAA2012.17⁴⁴), under site reference 603. The council confirms that through assessment of the site and correspondence with the landowner, the site is 'deliverable' (in line with the NPPF definition (NPP.01A⁴⁵)).

Issue 5.11 - Is it realistic to expect development within the River Avon catchment to be 'phosphate neutral'? What is the status of the Nutrient Management Plan referred to in the Memorandum of Understanding (HRA.03)? Does the WHSAP provide an effective mechanism for this to be delivered?

51. It is realistic to expect development to be 'phosphate neutral', as instigated by the Environment Agency (EA) and Natural England (NE). Working with these agencies and Wessex Water, alongside other planning authorities in the catchment, measures have been identified in an Interim Delivery Plan (HRA.05.01⁴⁶, HRA.05.02⁴⁷, HRA.05.03⁴⁸, HRA.05.04⁴⁹) that can deliver mitigation measures sufficient to make a reduction in phosphate at least equivalent to the forecast additional load from all development in the catchment. Importantly, these measures will, however, only be necessary as a contingency to a commitment from Wessex Water to peg phosphate levels at recent average levels (one of Company's Business Plan Outcome Delivery Incentives). The latter largely achieves phosphate neutrality of itself. The EA and NE therefore have realistic expectations.

⁴² [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁴³ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

⁴⁴ [\[SHLAA2012.17\]](#) SHLAA 2012 - Appendix 3 - Warminster

⁴⁵ [\[NPP.01A\]](#) National Planning Policy Framework (NPPF), March 2012

⁴⁶ [\[HRA 05.01\]](#) River Avon SAC - Phosphate IDP (Main Report)

⁴⁷ [\[HRA 05.02\]](#) River Avon SAC - Phosphate IDP (App A Figs 1-16)

⁴⁸ [\[HRA 05.03\]](#) River Avon SAC - Phosphate IDP (App A Figs 17-40)

⁴⁹ [\[HRA 05.04\]](#) River Avon SAC - Phosphate IDP (App B)

52. The SAC Nutrient Management Plan (NMP) (BIO.19⁵⁰) was produced in April 2015 to help manage and reduce phosphorous levels, in order to support the conservation objectives of the SAC and facilitate growth in such a way as to avoid any deterioration and achieve compliance with the Habitats Regulations. The NMP (BIO.19) therefore established that development can occur as outlined in the Wiltshire Core Strategy (WCO.01⁵¹) in a way that was consistent with Habitats Regulations.
53. The role of the NMP (BIO.19⁵²) has been supplemented by an Interim Delivery Plan (HRA.05.01⁵³, HRA.05.02⁵⁴, HRA.05.03⁵⁵, HRA.05.04⁵⁶) and Wessex Water Outcome Delivery Incentive (see above) as means to achieve phosphate neutrality. These instruments became necessary when, since preparation of the NMP (BIO.19), it became apparent, that reductions to levels of phosphate to the SAC, relying in large part on voluntary improvements to farming practice, were not being achieved to the extent intended by the NMP (BIO.19).
54. The WHSAP (WHSAP.01.01⁵⁷ and EXAM.01.01⁵⁸) will be delivered alongside the Interim Delivery Plan (HRA.05.01 - HRA.05.04) and Outcome Delivery Incentive. Housing development proposed within the WHSAP (WHSAP.01.01 and EXAM.01.01) is accounted for within overall forecast development, both residential and non-residential, on which both the Interim Delivery Plan (HRA.05.01 - HRA.05.04) and Outcome Delivery Incentive are based. The main source of funding for off-site mitigation is from the Community Infrastructure Levy, as specified on the Council Regulation 123 list. The Memorandum of Understanding (HRA.03⁵⁹) makes clear that on large schemes the Council will seek on site mitigation measures to help mitigate the effects of development. The Interim Delivery Plan (HRA.05.01 - HRA.05.04) describes on-site measures that can be explored. Individual WHSAP (WHSAP.01.01 and EXAM.01.01) proposals are not at a level of detail for it to be sensible to prescribe measures as part of a proposal; nor might this allow sufficient flexibility even if they were. The general principle as a foundation for the approach already exists in WCS (WCO.01) Core Policy 3.

⁵⁰ [\[BIO.19\]](#) River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁵¹ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

⁵² [\[BIO.19\]](#) River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁵³ [\[HRA 05.01\]](#) River Avon SAC - Phosphate IDP (Main Report)

⁵⁴ [\[HRA 05.02\]](#) River Avon SAC - Phosphate IDP (App A Figs 1-16)

⁵⁵ [\[HRA 05.03\]](#) River Avon SAC - Phosphate IDP (App A Figs 17-40)

⁵⁶ [\[HRA 05.04\]](#) River Avon SAC - Phosphate IDP (App B)

⁵⁷ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁵⁸ [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁵⁹ [\[HRA.03\]](#) Memorandum of Understanding - River Avon Special Area of Conservation Phosphate Neutral Development - Interim Mitigation

