Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H3.1 Netherhampton Road, Salisbury

PS/M3/50

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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 H3, H3.1 and the plan's supporting text at paragraphs 5.129 5.138 do provide sufficient detail on form, scale, access and quantity of development for site allocation H3.1.
- 2. Policy H3.1 of the Wiltshire Housing Site Allocations Plan (WHSAP) (WHSAP.01.01¹ and EXAM.01.01²) and paragraphs 5.129 to 5.138 provide an overview of the form and scale of development that is expected to be delivered on the site. The quantity of residential development to be delivered is stated as 'approximately 640 dwellings' and the mix of uses is stated as also comprising land for employment, a new two-form of entry primary school, a local centre and a country park. Access to this site will be achieved directly onto the A3094 which is adjacent to the site.
- 3. Other requirements of Policy H3.1 are that the development will include:
- Strategic landscaping and open space provision
- Transport network improvements necessary to accommodate the scale of development
- Provision of sufficient school and healthcare capacity to meet the need created
- Measures to safeguard the interest of Harnham Hill Chalk Pit SSSI and Harnham Slope County Wildlife Site
- Surface water management that achieves equivalent or less than current greenfield rates of run-off
- 4. Policy H3.1 requires that development will take place in accordance with a masterplan for the site approved by the Council, and the Schedule of Proposed Changes (EXAM.01.01) ref PC102 confirms that this masterplan will be approved as part of the planning application process.
- 5. The level of detail provided within the WHSAP (WHSAP.01.01 and EXAM.01.01) is sufficient, given that there are already policies concerning appropriate form, scale and access set out in policies in the Wiltshire Core Strategy (WCO.01³) that will also be used to determine future planning applications on the site. This is clarified in paragraphs 5.1 to 5.12 of the WHSAP (WHSAP.01.01) e.g. paragraph 5.2 recognises that the design and form of development will need to accord with Core Policy 57 of the Wiltshire Core Strategy (WCO.01).

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

6. Yes, the amount of development proposed for this site is justified having regard to any constraints and the provision of necessary infrastructure.

¹ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

² EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

³ <u>WCO.01</u> Wiltshire Core Strategy, January 2015

- 7. The quantum of development appropriate for this site was considered through the site selection process (TOP.024) including the Sustainability Appraisal (SA.01.A.a5 and SA.01.A6⁶), and the findings are presented in the Salisbury Community Area Topic Paper (CATP) (CATP.137) at Chapter 5 and Appendices D, F and G.
- 8. Sites that had been assessed through the Strategic Housing Land Availability Assessment (SHLAA) (SHLAA2012.198), formed the starting point of further detailed assessment in line with Stage 2 of the Site Selection Methodology (TOP.02), as set out in Appendix D of the Salisbury CATP (CATP.13).
- 9. The SHLAA site development capacities were estimated following the methodology set out in the September 2011 SHLAA Methodology (SHELAA.229) which formed a starting point for assessment using a density of 30 dwellings per hectare and applying a multiplier to reduce the developable area to allow for non-housing uses.
- 10. In the case of Policy H3.1, the capacity of SHLAA site S1028 was 1195 dwellings for this site. Stage 2 of the site selection process (TOP.02) considered whether any exclusionary criteria should be applied which may result in a reduction of the SHLAA site capacity. For this site, Appendix D of the Salisbury CATP (CATP.13) shows that no exclusionary criteria were relevant, and the developable site capacity remained the same at 1195 dwellings.
- 11. Through Stages 3 and 4 of the site selection process (TOP.02), further detailed assessment into site constraints, potential mitigation measures and infrastructure requirements was carried out to establish a realistic, deliverable amount of development for this site. Table G.5 of the Salisbury CATP (CATP.13) lists a number of potential effects of developing this site and mitigation measures - these relate to biodiversity, land use, water infrastructure, air quality and environmental pollution, heritage assets, landscape, education facilities and employment.
- 12. Table G.5 then gives further consideration to site constraints and provision of necessary infrastructure within the site, stating that 'a substantial area would need to be set aside for landscaping and other land in the SHLAA site would need to be removed from the allocation in order to ameliorate visual impacts....other land would need to be reserved for a new primary school'...and...'development of this scale would include a local centre necessary to serve a development of this scale. Table G.5 also considers that it would be appropriate that the site include an element of employment alongside other uses. It concludes that 'taking account of these requirements, the site could accommodate approximately 640 dwellings'.
- 13. The WHSAP (WHSAP.01.01¹⁰ and EXAM.01.01¹¹), paragraph 5.128, then details three specific considerations and constraints that need to be addressed in order for housing development to be accommodated in Salisbury. Further considerations and constraints specific to this site are outlined in paragraphs 5.129 to 5.138 and in the Schedule of Proposed Changes (EXAM.01.01) - refs PC99 to and PC103.

¹⁰ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

TOP.02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

SA.01.A.a Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

SA.01.A6 Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018 SHLAA2012.19 Strategic Housing Land Availability Assessment Appendix 3 – Wilton, July 2013

⁹ SHELAA.22 Strategic Housing Land Availability Assessment – Methodology, September 2011

¹¹ EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

14. Details relating to specific infrastructure requirements will be confirmed through the planning application process, in accordance with the Wiltshire Core Strategy (WCO.01¹²) and in light of up to date evidence. However, it is considered that approximately 640 dwellings and an element of employment uses on this site is justified, given the size of the site, acknowledged constraints and infrastructure requirements.

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

- 15. Likely effects of developing this site on biodiversity have been assessed in the Sustainability Appraisal Report and Annex I (SA.01.A.a¹³ and SA.01.A6¹⁴), Habitats Regulations Assessment (HRA) (HRA.01¹⁵, HRA.02¹⁶ and HRA.02.a¹⁷) and in Stage 4a of the site selection process (TOP.02¹⁸), presented in the Salisbury CATP Appendix G (CATP.13¹⁹). These assessments do not indicate that the site should not be allocated due to impacts on biodiversity.
- 16. The SA (SA.01.A.a and SA.01.A6) evaluated this site as having likely moderate adverse effects on biodiversity. The HRA screening assessment (HRA.01) identified that development at Salisbury could contribute towards impacts upon the River Avon SAC through increased phosphate loading and habitat loss / damage. This evaluation was given to all sites assessed in Salisbury through the SA (SA.01.A.a and SA.01.A6) because of this issue. The SA assessment of this site is summarised in the Salisbury CATP (CATP.13) in Table F.9.
- 17. The further addendum to the HRA (HRA.02.a) in Chapter 3 provides an update on progress made to date with the development of mitigation strategies. With regards to phosphate impacts on the River Avon SAC, this update states that 'allocations at Warminster, Salisbury and Durrington must demonstrate that they will be phosphate neutral in order to demonstrate there will be no adverse effect from development'. Paragraph 3.2.4 confirms that 'the Council, Natural England (NE), the Environment Agency (EA), Wessex Water PLC, New Forest District Council, New Forest National Park Authority and Christchurch and East Dorset Council are making constructive progress and have developed a Memorandum of Understanding (MoU) (HRA.03²⁰) which was finalised to support submission of the Plan'.
- 18. The HRA addendum (HRA.02.a) concludes that 'an agreed form of wording with the Environment Agency and Natural England has been inserted into the Plan that references the role of the Memorandum of Understanding in order to provide greater certainty over the need to provide for phosphate neutral development'. This additional wording inserted into the plan is included in the Schedule of Proposed Changes

¹² WCO.01 Wiltshire Core Strategy, January 2015

¹³ SA.01.A.a Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

¹⁴ SA.01.A6 Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

¹⁵ HRA.01 Wiltshire Housing Site Allocations Plan Habitats Regulations Assessment Pre Submission, June 2017

¹⁶ HRA.02 Addendum to Wiltshire Housing Site Allocations Plan Pre-Submission Assessment under the Habitats Regulations, May 2018

¹⁷ HRA.02.a Addendum to Wiltshire Housing Site Allocations Plan Pre-Submission Assessment under the Habitats Regulations Minor Factual Update to support the consultation on the Council's Schedule of Proposed Changes, September 2018

¹⁸ TOP.02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

¹⁹ CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

²⁰ HRA.03 Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

- (EXAM.01.01²¹) ref PC98 and this will allow phosphate neutral development to take place within the river catchment.
- 19. This site is currently in intensive agricultural use and there is little biodiversity value within the site itself. There are no designated or non-designated biodiversity features within the site. West Harnham Chalk Pit Site of Special Scientific Interest (SSSI) and Harnham Slope County Wildlife Site (CWS) are located adjacent to this site. WHSAP (WHSAP.01.01²² and EXAM.01.01) Policy 3.1 and paragraph 5.135 require these assets to be protected and potential additional recreational use to be positively managed. Paragraph 5.135 requires 'sufficient areas of public open space should be incorporated into a layout and design in order to protect these sites by providing attractive, alternative areas for recreation. To support this objective, a significant sized Country Park will be provided in the south and east of the site for recreational use by the public as part of open space and green infrastructure provision.
- 20. Mitigation measures are considered to be achievable to reduce or avoid any impacts of development on biodiversity.

ii. green infrastructure and agricultural land

- 21. Likely effects of developing this site on green infrastructure and agricultural land have been assessed in the Sustainability Appraisal (SA.01.A.a²³ and SA.01.A6²⁴) and in Stage 4a of the site selection process (TOP.02²⁵), presented in the Salisbury CATP (CATP.13²⁶). The assessments do not indicate that the site should not be allocated.
- 22. The various fields that make up this site are all currently in arable use, primarily under cereal production. The Sustainability Appraisal (SA.01.A.a and SA.01.A6) considers whether this site contains any Best and Most Versatile (BMV) agricultural land and states in Annex 1 Page 94 that 'this site is partly unclassified and also a mixture of both Grade 3a and Grade 2 Agricultural Land Classification.' Therefore, development of this site is likely to involve the loss of some BMV land. However, the NPPF (paragraph 112) advises local planning authorities to take into account the economic and other benefits of BMV land. When taking into account the considerable economic and social benefits of developing this site for housing and employment uses, the benefits are considered to outweigh the loss of the agricultural land.
- 23. The SA Annex I (SA.01.A6) page 103 also assessed likely effects on green infrastructure and found that the 'development of this large site for housing would offer the potential to deliver a comprehensive network of green infrastructure'. WHSAP (WHSAP.01.01 and EXAM.01.01) Policy H3.1 and paragraphs 5.133 and 5.135 require a significant amount of strategic landscaping, green infrastructure and open space provision, including a Country Park of at least 10ha in size. Paragraph 5.133 states that 'this location has capacity to accommodate change from an environmental and landscape perspective. Mitigation is considered achievable to reduce any potential adverse landscape effects...through significant provision of appropriately located public open space and green infrastructure...Substantial new tree planting will reflect typical downland characteristics'. Paragraph 5.135 states that 'sufficient areas of public open space should be incorporated into a layout and design...by providing attractive, alternative areas for recreation. To support this objective, a significant sized Country

²¹ EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

²² WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

²³ SA.01.A.a Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

²⁴ SA.01.A6 Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

²⁵ TOP.02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

²⁶ CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

Park will be provided in the south and east of the site for recreational use by the public as part of open space and green infrastructure provision'.

iii. landscape quality and character

- 24. Likely effects of developing this site on landscape quality and character have been assessed in the Sustainability Appraisal (SA.01.A.a²⁷ and SA.01.A6²⁸), Site Landscape Assessment Part 2 June 2017 (PSCON.11B²⁹) and in Stage 4a of the site selection process (TOP.02³⁰), presented in the Salisbury CATP (CATP.13³¹). The assessments do not indicate that the site should not be allocated. The SA concludes that landscape impacts from developing this site are likely to be minor adverse overall given the significant opportunities for mitigation.
- 25. The Sustainability Appraisal Annex I (SA.01.A6) pages 103 104 considers likely minor landscape effects from developing this site. It states that 'part of the site, to the south, is sloping with a localised ridge. This is a fairly visually sensitive location as it forms the backdrop to a number of views towards Salisbury Cathedral spire. However, there is a considerable amount of existing residential development at Harnham, in between this site and the cathedral. The site is also large enough for significant open space and GI to be incorporated into the overall design.' With regards potential mitigation, it concludes that 'mitigation...could include restricting development to lower parts of the site in the north of the site to provide a sufficient visual buffer to open countryside, reducing effects on the setting of the AONB to the south-west and Old Shaftesbury Drove track to the south. The downland setting, rising as a backdrop to the valley floor, should be retained.'
- 26. The Landscape Assessment Part 2 (PSCON.11B) considered this site in terms of impacts on a number of landscape factors, including landscape character, views, impact assessment and capacity to accommodate change. The assessment states that 'the site is large, open and exposed and visible from a number of publically accessible routes and forms the backdrop to a number of important views towards Salisbury Cathedral spire and an important western approach to the city. Development is likely to adversely affect those views and it would be difficult to mitigate against this.'
- 27. It concluded that 'if development is to be proposed on the site, it would be essential for higher ground and ridgelines to be precluded from housing. Specifically, the higher ground and ridgeline at the eastern part of the site should be remain as open space with some appropriate tree planting in keeping with the character of the adjacent Harnham Hill and the surrounding countryside. A similar approach should be applied to the higher ground of the southern part of the site.... other areas of the site should be retained as open space to help emphasise the undulating nature of the landform.'
- 28. In recognition of the Sustainability Appraisal (SA.01.A6) and Landscape Assessment (PSCON.11B) findings, WHSAP (WHSAP.01.01³²) Policy H3.1 requires strategic landscaping and open space provision, with all development to be located below the 75m contour, and a Country Park to be located in the east and south of the site on the higher parts of the site.

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²⁷ SA.01.A.a Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

²⁸ SA.01.A6 Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

²⁹ PSCON.11B Wiltshire Housing Site Allocations Plan Stage 4a Site Landscape Assessment Part 2, June 2017

³⁰ TOP 02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

³¹ CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

³² WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

29. Paragraph 5.133 (WHSAP.01.01³³) states that 'this location has capacity to accommodate change from an environmental and landscape perspective. The edge of the Cranborne Chase and West Wiltshire Downs AONB lies approximately 2km southwest of this site and no significant impacts on the AONB are considered likely. Mitigation is considered achievable to reduce any potential adverse landscape effects, including on visual connections to local landmark features e.g. Salisbury Cathedral, Old Sarum and Netherhampton Church, through significant provision of appropriately located public open space and green infrastructure, with new residential development located in the northern part of the site and restricted to below the 75m contour line. Substantial new tree planting will reflect typical Downland characteristics'.

iv. heritage assets

- 30. Likely effects of developing this site on heritage assets have been assessed in the Sustainability Appraisal (SA.01.A.a³⁴ and SA.01.A6³⁵) and in Stage 4a of the site selection process (TOP.02³⁶), presented in the Salisbury CATP (CATP.13³⁷). The assessments do not indicate that the site should not be allocated due to impacts on heritage assets, and mitigation measures to reduce the likely adverse effects of developing this site are considered to be achievable.
- 31. The SA (SA.01.A.a and SA.01.A6) considers that, overall, there are likely to be minor adverse effects on heritage assets. SA Annex I (SA.01.A6) page 102 concludes that 'there are no buildings or areas of historical or cultural value within, adjacent to or in proximity to this site that are likely to be adversely affected. The development of this site would cause no impact on designated heritage assets'.
- 32. SA Annex I (SA.01.A6) page 102 notes that 'this site has high archaeological potential. However, this is a large site and the exact extent of archaeological works is not certain. It is possible that the area of archaeological interest only covers a section of this site. Assessment and preservation in situ would be required and is considered possible, depending on the location'.
- 33. WHSAP (WHSAP.01.01 and EXAM.01.01³⁸) paragraph 5.134 states that '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. Investigations should inform a master plan for the site and an archaeological assessment would be required to support a subsequent planning application'. Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13) at Table G.5 confirms that this would be 'a matter for detailed design and unlikely to significantly reduce the developable area of the site'.

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³³ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

³⁴ SA.01.A.a Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

³⁵ SA.01.A6 Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

³⁶ TOP.02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

 ³⁷ CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018
 38 EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document,

v. strategic and local infrastructure including transport

- 34. Likely effects of developing this site on strategic and local infrastructure have been assessed in the Sustainability Appraisal (SA.01.A.a³⁹ and SA.01.A6⁴⁰) and in Stage 4a of the site selection process (TOP.02⁴¹), presented in the Salisbury CATP (CATP.13⁴²). The assessments do not indicate that the site should not be allocated.
- 35. WHSAP (WHSAP.01.01⁴³ and EXAM.01.01⁴⁴) paragraphs 5.1 5.12 introduce a range of generic infrastructure requirements that may be required for each site. Paragraph 5.1 states that 'development will be required to provide for the necessary on-site and, where necessary, off-site infrastructure requirements arising from proposals in accordance with [WCS] Core Policy 3 (Infrastructure requirements)'. Requirements for infrastructure contributions will be subject to review through the consideration of future planning applications submitted on the site.
- 36. WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.128, Policy H3.1 and paragraphs 5.129 5.138 set out the various strategic and local infrastructure requirements for this site, all of which are considered to be achievable.
- 37. Refer to response to vi. below for further information regarding effects on the transport network through Salisbury.

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

- 38. Likely effects of developing this site on the efficient operation of the transport network and highway safety have been assessed in the Sustainability Appraisal (SA.01.A.a and SA.01.A6) and in Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13). The assessments do not indicate that the site should not be allocated.
- 39. The Salisbury CATP (CATP.13), Table G.2, acknowledges that 'there are ongoing pressures on the highway network through Salisbury with significant congestion at peak times. The Salisbury Transport Strategy Draft Strategy Refresh 2018 [WHSAP.08⁴⁵ and WHSAP.08A⁴⁶] has developed measures to accommodate growth and maintain the efficiency of the transport network. This would be developed alongside the assessment and development of site-specific measures'.
- 40. This is reflected in the WHSAP (WHSAP.01.01 and EXAM.01.01), paragraph 5.128, as amended by the Schedule of Proposed Changes (EXAM.01.01) ref PC97, which states 'the refresh of the Salisbury Transport Strategy (2018) has reviewed the effectiveness of existing measures and proposes new ones to accommodate growth. Development will contribute to these wider network measures, where necessary, alongside measures that are implemented expressly as part of specific development proposals'.
- 41. The Salisbury CATP (CATP.13), Table G.5, states that 'direct vehicular access can be achieved via the A3094 Netherhampton Road. Impacts of developing this site on the road network through Salisbury will need to be addressed through a comprehensive

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³⁹ SA.01.A.a Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁴⁰ SA.01.A6 Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁴¹ TOP.02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴² CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁴³ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁴⁴ EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁴⁵ WHSAP.08 Salisbury Transport Strategy Draft Strategy Refresh 2018, July 2018

⁴⁶ WHSAP 08A Salisbury Transport Strategy Draft Strategy Refresh 2018 Summary, June 2018

Transport Assessment. Such is the scale of potential impacts on the local transport network, the masterplanning of this site would need to be developed taking into account the refresh of the Salisbury Transport Strategy (2018). The site is located approximately 1.7km to the south of Salisbury City centre. Whilst access to bus services and walking routes would be possible, future residents would most likely rely on private vehicles to access city centre services and facilities. However, the number of dwellings anticipated on this site could lead to improved public transport access. A local centre could also meet some everyday requirements for services and facilities and reduce the need to travel'.

42. WHSAP (WHSAP.01.01⁴⁷ and EXAM.01.01⁴⁸) Policy H3.1 requires 'transport network improvements necessary to accommodate the scale of development envisaged' and paragraph 5.136, as amended by the Schedule of Proposed Changes (EXAM.01.01) ref PC100, states that 'comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. Accordingly, contributions towards these improvements will likely be sought. To address such matters, dialogue with Highways England will be required and work would take place in conjunction with the Salisbury Transport Strategy Refresh (2018). Mitigation measures will be guided by evidence from a robust and comprehensive transport assessment which will need to be undertaken by any future applicant, the scope of which is to be agreed by Wiltshire Council and Highways England. The assessment would fully investigate detailed transport impacts of the development on the wider Salisbury transport network, especially on the A36T, and identify appropriate measures to safely accommodate additional traffic emanating from the new development'.

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

- 43. Likely effects of developing this site on air and water quality, noise pollution, odours, land stability, groundwater and flood risk have been assessed in the Sustainability Appraisal (SA.01.A.a⁴⁹ and SA.01.A6⁵⁰) and in Stage 4a of the site selection process (TOP.02⁵¹), presented in the Salisbury CATP (CATP.13⁵²). The assessments do not indicate that the site should not be allocated.
- 44. The SA (SA.01.A.a and SA.01.A6) has noted likely minor adverse effects from development of this site for these factors that are capable of being mitigated. The site consists of a number of arable fields and there are no known contamination issues. The site is located entirely within Flood Zone 1 and WHSAP (WHSAP.01.01 and EXAM.01.01) Policy H3.1 requires 'surface water management that achieves equivalent or less than current greenfield rates of run-off'.
- 45. WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.138, as amended by the Schedule of Proposed Changes (EXAM.01.01) ref PC103, states that '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 comprehensive Surface Water Drainage measures (including

⁴⁷ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁴⁸ EXAM.01.01 Wiltshire Housing Šite Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁴⁹ SA.01.A.a Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁵⁰ SA.01.A6 Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁵¹ TOP.02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁵² CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

- a Sustainable Drainage System) that results in run-off rates equalling or bettering current greenfield infiltration rates.'
- 46. There are no specific issues related to odour, noise or land stability associated with this site. Adjacent to the site to the east is the In-Excess retail development and adjacent to the site to the west is the Netherhampton Sale Rooms, and therefore the site is already affected by a degree of noise and light pollution. Stage 4a of the site selection process (TOP.02⁵³), presented in the Salisbury CATP (CATP.13⁵⁴) in Table G.5, states that 'given the scale of the development, any future application should contain details to demonstrate that the potential impacts of light pollution have been fully considered and mitigated. This will be important in respect of the setting of the Cranborne Chase and West Wiltshire Downs AONB and the management board's aim to achieve Dark Sky status. A lighting report detailing external lighting should be submitted with any full application'.
- 47. Development is considered likely to increase local commuter traffic, which may impact on local air quality. Measures will need to be developed and implemented to mitigate vehicular emissions in line with local plan policies and the council's Air Quality Strategy, and this should be considered in the comprehensive transport assessment required by WHSAP (WHSAP.01.01⁵⁵ and EXAM.01.01⁵⁶) paragraph 5.136.
- 48. WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.137 requires that, in addition to a comprehensive transport assessment taking place in conjunction with the Salisbury Transport Strategy refresh (WHSAP.08⁵⁷ and WHSAP.08A⁵⁸) 'measures to positively promote and support cycling, walking and public transport use would also need to be addressed through any subsequent planning application process.... to enable as many trips as possible to the city centre to take place on foot, cycling or by public transport'. These measures could help reduce any adverse effects of increased vehicle usage on air quality.

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

- 49. Likely effects of developing this site on open space, recreational facilities and public rights of way have been assessed in the Sustainability Appraisal (SA.01.A.a⁵⁹ and SA.01.A6⁶⁰) and in Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13). The assessments do not indicate that the site should not be allocated.
- 50. The site is currently in intensive arable use and there is no designated open space or common land within the site.
- 51. Significant amounts of public open space, strategic landscaping and green infrastructure are required as part of development through WHSAP (WHSAP.01.01 and EXAM.01.01) Policy H3.1, including a Country Park of at least 10ha in size. Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13) in Table G.5, states that 'the site is large enough to allow opportunities to provide well connected areas of landscaped open space (green infrastructure) and blocks of

⁵³ TOP.02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁵⁴ CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁵⁵ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁵⁶ EXAM.01.01 Wiltshire Housing Šite Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁵⁷ WHSAP.08 Salisbury Transport Strategy Draft Strategy Refresh 2018, July 2018

⁵⁸ WHSAP 08A Salisbury Transport Strategy Draft Strategy Refresh 2018 Summary, June 2018

⁵⁹ SA.01.A.a Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁶⁰ SA.01.A6 Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

woodland planting to mitigate a hard, urban edge and provide a buffer to surrounding open downland'. The summary section of Table G.5 states that 'this site could deliver substantial benefits through... opportunities for biodiversity enhancement and significant green infrastructure provision. An allocation would be large enough to...provide significant, strategically placed open space and green infrastructure to mitigate any harmful impacts on the visual qualities of the surrounding countryside...'

- 52. WHSAP (WHSAP.01.01⁶¹ and EXAM.01.01⁶²) paragraph 5.135 refers to the West Harnham Chalk Pit Site of Special Scientific Interest (SSSI) and Harnham Slope County Wildlife Site (CWS) and requires that 'sufficient areas of public open space should be incorporated into a layout and design in order to protect these sites by providing attractive, alternative areas for recreation' and that 'to support this objective, a significant sized Country Park will be provided in the south and east of the site for recreational use by the public as part of open space and green infrastructure provision'.
- 53. WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.137, in seeking to positively promote sustainable forms of transport, recognises that 'the bridleway leading from the site (NHAM10) is likely to be a key route for people walking and cycling from the site connecting to the Old Shaftesbury Drove and into Harnham. This paragraph includes a requirement for 'development of the site should include suitable surfacing of this route throughout the site'.
- 54. Along the southern side of the A3094 adjacent to this site there is an existing shared-use pedestrian and cycle path serving the adjacent Harnham residential area, Harnham Trading Estate, Harnham Business Park, In-Excess retail store and Netherhampton Sale Rooms, which will allow future residents the opportunity to walk or cycle to use services and facilities within the local area, including Harnham and the city centre.

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?

- 55. Yes, it is considered that the plan does contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development.
- 56. WHSAP (WHSAP.01.01) Policy H3.1 and the supporting text to the policy in paragraphs 5.128 5.138 and amendments proposed in the Schedule of Proposed Changes (EXAM.01.01) ref PC99 PC103, provide contextual detail which will guide future developers and decision makers and inform mitigation measures that may be required. The site will be developed in accordance with existing policies set out in the Wiltshire Core Strategy (WCO.01⁶³), such that there are already effective safeguards to ensuring acceptable forms of development are to be delivered.

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⁶¹ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁶² EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁶³ WCO.01 Wiltshire Core Strategy, January 2015

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?

- 57. WHSAP (WHSAP.01.01⁶⁴ and EXAM.01.01⁶⁵) paragraphs 5.1 5.12 introduce a range of generic requirements that may be required for each site. Paragraph 5.1 states that 'development will be required to provide for the necessary on-site and, where necessary, off-site infrastructure requirements arising from proposals in accordance with [WCS] Core Policy 3 (Infrastructure requirements)'.
- 58. Requirements for infrastructure contributions will be subject to review through the consideration of future planning applications submitted on the site. It is considered that contributions specified for this site are necessary and justified by the evidence base and the plan is clear on how and when infrastructure will be provided.
- 59. WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.128, Policy H3.1 and paragraphs 5.129 5.138 set out the various strategic and local infrastructure requirements for this site, all of which are considered to be achievable and justified by the evidence base.
- 60. This site has also been subject to a specific viability assessment (WHSAP.25⁶⁶). This assessment is intended to assist the Council in understanding the broad viability of its proposed housing site allocations in terms of their ability to accommodate typical development costs and local plan policy requirements (e.g. affordable housing expectations). The H3.1 Netherhampton Road site allocation was appraised individually because it has particular infrastructure requirements specified in the proposed policies i.e. education and transport infrastructure. The appraisal of the H3.1 Netherhampton Road site is set out in chapter 7 of the assessment.
- 61. The assessment of the H3.1 Netherhampton Road site takes into account the costs of site specific S106 obligations (road and education payments) and concludes that this site can support 40% affordable housing and the specific S106 obligations whilst generating a significant financial surplus when benchmarked against a specific site value range.

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?

- 62. The site is considered to be in an accessible location with good access to everyday facilities by a range of means of transport.
- 63. Stage 4a of the site selection process (TOP.02⁶⁷), presented in the Salisbury CATP (CATP.13⁶⁸) in Table G.5, states that 'the site is located approximately 1.7km to the south of Salisbury City centre. Whilst access to bus services and walking routes would be possible, future residents would most likely rely on private vehicles to access city centre services and facilities. However, the number of dwellings anticipated on this site could lead to improved public transport access. A local centre could also meet some everyday requirements for services and facilities and reduce the need to travel'. It is anticipated that services and facilities to be provided on-site, including at the local

⁶⁴ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁶⁵ EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁶⁶ WHSAP.25 Wiltshire Housing Site Allocations Plan Pre-Submission Draft Plan Viability Assessment, June 2017

⁶⁷ TOP.02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁶⁸ CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

- centre, the new primary school and employment to be provided on this site will allow some reduction in the need to travel to other parts of the city.
- 64. The comprehensive transport assessment required by WHSAP Policy H3.1 will need to take into account the Salisbury Transport Strategy Refresh 2018 (WHSAP.08⁶⁹ and WHSAP.08A⁷⁰), as per WHSAP (WHSAP.01.01⁷¹ and EXAM.01.01⁷²) paragraph 5.136. It should identify appropriate measures to safely accommodate additional traffic emanating from the new development, and include measures to positively promote and support cycling, walking and public transport use. This site is reasonably well located in relation to the city centre and development should include measures to enable as many trips as possible to the city centre to take place on foot, cycling or by public transport.
- 65. In terms of walking and cycling accessibility from this site, there is an existing shared-use pedestrian and cycle path running along the A3094 adjacent to the site, serving the adjacent Harnham residential area, Harnham Trading Estate, Harnham Business Park, In-Excess retail store and Netherhampton Sale Rooms. This will allow future residents the opportunity to walk or cycle to use services and facilities within Harnham and the city centre, and there are opportunities for this path to be upgraded as part of this development.
- 66. Currently, bus routes serve the adjacent residential area of Harnham and the nearest bus stop is at Upper Street, approximately 600m from this site. However, with approximately 640 new dwellings in total allocated on this site, and approximately 100 dwellings allocated opposite this site at H.3, it is considered likely that existing bus routes can and will be extended to serve this site.

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?

- 67. The submission version of the WHSAP (WHSAP.01.01⁷³) 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 that have been identified as requiring a master plan.
- 68. 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 in 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.01⁷⁴).

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⁶⁹ WHSAP.08 Salisbury Transport Strategy Draft Strategy Refresh 2018, July 2018

⁷⁰ WHSAP 08A Salisbury Transport Strategy Draft Strategy Refresh 2018 Summary, June 2018

⁷¹ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁷² EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁷³ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁷⁴ WCO.01 Wiltshire Core Strategy, January 2015

69. In conclusion, 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?

- 70. The proposed allocation is considered to be deliverable in the timescales envisaged.
- 71. This site is identified within Wiltshire Council's 2012 Strategic Housing Land Availability Assessment (SHLAA) (SHLAA2012.1975), under site reference S1028. The assessment states that there are no suitability constraints and that residential development is achievable and deliverable. This position has been confirmed by the developer.

Issue 5.9 - For sites in Salisbury, will the plan be effective in preserving or enhancing the setting of the Cathedral?

- 72. This site is not considered likely to adversely affect the setting of Salisbury Cathedral. This site is located to the south of the A3094 and therefore will not impact on views of the cathedral spire when travelling east along the A3094.
- 73. The SA at Annex I (SA.01.A6⁷⁶) page 102 concludes that 'the development of this site would cause no impact on designated heritage assets'.
- 74. WHSAP (WHSAP.01.01⁷⁷ and EXAM.01.01⁷⁸) paragraph 5.133 states that '*mitigation* is considered achievable to reduce any potential adverse landscape effects, including on visual connections to local landmark features e.g. Salisbury Cathedral, Old Sarum and Netherhampton Church, through significant provision of appropriately located public open space and green infrastructure, with new residential development located in the northern part of the site and restricted to below the 75m contour line'.

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?

75. 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 (IDP) (HRA.05.0179, HRA.05.0280, HRA.05.0381, HRA.05.0482) 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 the Company's Business Plan Outcome Delivery Incentives (ODI)). The latter largely achieves phosphate neutrality of itself. EA and NE therefore have realistic expectations.

⁷⁵ SHLAA2012.19 Strategic Housing Land Availability Assessment Appendix 3 – Wilton, July 2013

⁷⁶ SA.01.A6 Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁷⁷ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁷⁸ EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁷⁹ <u>HRA.05.01</u> River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

 ⁸⁰ HRA.05.02 River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix A Figs 1-16, January 2019
 81 HRA.05.03 River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix A Figs 17-40, January 2019

⁸² HRA.05.04 River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

- 76. The SAC Nutrient Management Plan (NMP) (BIO.1983) 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.01⁸⁴) in a way that was consistent with Habitats Regulations.
- 77. The role of the NMP (BIO.19) has been supplemented by the IDP (HRA.05.0185, HRA.05.0286, HRA.05.0387, HRA.05.0488) and Wessex Water Outcome Delivery Incentive (see above) as a 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).
- 78. The WHSAP (WHSAP.01.0189 and EXAM.01.0190) will be delivered alongside the IDP (HRA.05.01 – HRA.05.04) and ODI. 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 IDP (HRA.05.01 - HRA.05.04) and ODI 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 (MoU) (HRA.03⁹¹) makes clear that on large schemes the Council will seek on site mitigation measures to help mitigate the effects of development. The IDP (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.

Issue 5.18 - For Site 3.1, is the policy sufficiently clear about the mix of development, in particular what would be expected in terms of employment land and a local centre?

- 79. It is considered that policy H3.1 is sufficiently clear about the mix of development. Policy H3.1 includes a requirement for the following mix of development:
- approximately 640 dwellings
- land for employment (B1, B2 and B8 uses of the Use Classes Order)
- at least 1.8ha of land for a two-form entry primary school along with playing pitches
- a local centre
- a Country Park of at least 10ha in size with associated parking and facilities
- 80. With regards provision of employment land, Stage 4a of the site selection process (TOP.0292), presented in the Salisbury CATP (CATP.1393) in Table G.5, explains that 'it would be appropriate that the site include an element of employment alongside other

85 HRA.05.01 River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

⁸³ BIO.19 River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁸⁴ WCO.01 Wiltshire Core Strategy, January 2015

⁸⁶ HRA.05.02 River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix A Figs 1-16, January 2019
87 HRA.05.03 River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix A Figs 17-40, January 2019

⁸⁸ HRA.05.04 River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

⁸⁹ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁹⁰ EXAM.01.01 Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁹¹ HRA.03 Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

⁹² TOP.02 Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁹³ CATP.13 Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

uses. Evidence does not suggest a specific quantum of employment land. This would be a matter for discussion with relevant stakeholders as a part of preparing a master plan for the site, but employment uses would be defined as those within classes B1, B2 and B8 of the Use Classes Order'.

- 81. WHSAP (WHSAP.01.01⁹⁴ and EXAM.01.01⁹⁵) paragraph 5.132 explains that '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'.
- 82. With regards the local centre within the development a local centre is considered necessary to serve a development of this scale and would be expected to provide facilities to meet some everyday requirements, including a convenience store that stocks a range of everyday items such as groceries, newspapers and toiletries. Policy H3.1 requires 'provision of sufficient...healthcare capacity to meet the need created by the development' and it is considered that the local centre could include facilities to meet this need e.g. a GP surgery.

⁹⁵ EXAM.01.01 Wiltshire Housing Šite Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁹⁴ WHSAP.01.01 Wiltshire Housing Site Allocations Plan - Submission Document, July 2018