

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H3.2 Hilltop Way, Salisbury

PS/M3/55

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Matter 3: Housing Site Allocations

H3.2 Hilltop Way, Salisbury

Issue 5: Are the proposed sites justified, effective and consistent with national policy?
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Issue 5.1 - Does the plan provide sufficient detail on form, scale, access and quantity of development for each site?

1. Yes, Policy H3 and the plan's supporting text do provide sufficient detail on form, scale, access and quantity of development for site allocation H3.2.
2. Site allocation H3.2 of the WHSAP (WHSAP.01.01¹) and paragraphs 5.139 to 5.142 provide an overview of the form and scale of development that is expected to be delivered on the site. The quantity of development to be delivered is stated in paragraph 5.139 as '*approximately 10 dwellings on approximately 0.48ha of land*' and vehicular access is stated as '*via Hilltop Way*' which is an existing public road adjacent to the site.
3. The level of detail provided within the WHSAP (WHSAP.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.01²) 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 plan 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.

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

4. Yes, the amount of development proposed for this site is justified having regard to any constraints and the provision of necessary infrastructure.
5. The quantum of development appropriate for this site was considered through the site selection process (TOP.02³), including the Sustainability Appraisal (SA.01.A.a⁴ and SA.01.A6⁵), and the findings are presented in the Salisbury CATP (CATP.13⁶) at Chapter 5 and Appendices D, F and G.
6. Sites that had been assessed through the Strategic Housing Land Availability Assessment (SHLAA2012.12⁷) 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).
7. The SHLAA site development capacities were estimated following the methodology set out in the September 2011 SHLAA Methodology (SHELAA.22⁸) 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.

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

² [WCO.01](#) Wiltshire Core Strategy, January 2015

³ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁵ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

⁶ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁷ [SHLAA2012.12](#) Strategic Housing Land Availability Assessment Appendix 3 – Salisbury, July 2013

⁸ [SHELAA.22](#) Strategic Housing Land Availability Assessment – Methodology, September 2011

8. In the case of site allocation H3.2, the capacity of SHLAA site S61 was 11 dwellings for this site. Stage 2 of the site selection process (TOP.02⁹) 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.13¹⁰) shows that no exclusionary criteria were relevant, and the developable site capacity remained the same at 11 dwellings.
9. 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.3 of the Salisbury CATP (CATP.13) lists a number of potential effects of developing this site and mitigation measures – these relate to biodiversity, air quality and environmental pollution, heritage and landscape. Table G.3 then states that *'mitigation measures to reduce the likely minor adverse effects of developing this site are considered to be reasonable and achievable. Considering the effects noted above and taking account of required mitigation measures, the site capacity would be capable of delivering approximately 10 dwellings'*.
10. The WHSAP (WHSAP.01.01¹¹), paragraph 5.128, then details three specific considerations that need to be addressed in order for housing development to be accommodated in Salisbury. Further considerations specific to this site are outlined in paragraphs 5.139 to 5.142.
11. 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 10 dwellings 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

12. 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) and in Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP Appendix G (CATP.13). These assessments do not indicate that the site should not be allocated due to impacts on biodiversity.
13. The SA (SA.01.A.a and SA.01.A6) evaluated this site as having likely moderate adverse effects on biodiversity because the HRA screening assessment 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 because of this issue. The SA assessment of this site is summarised in the Salisbury CATP (CATP.13) in Table F.4.

⁹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

¹⁰ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

¹¹ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

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 I A6, May 2018

14. The further addendum to the HRA (HRA.02a¹⁵) 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) which was finalised to support submission of the Plan'*.
15. The HRA addendum (HRA.02a) 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 Understanding¹⁶ 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 (EXAM.01.01¹⁷) ref PC98 and this will allow phosphate neutral development to take place within the river catchment.
16. The SA Annex 1 (SA.01.A6¹⁸) at page 4 also highlights a particular issue at this site due to reptile surveys having shown a high number of slow worms at this site. This is considered to be mitigable and the SA and Salisbury CATP (CATP.13¹⁹) recommends that before any development takes place on this site, a mitigation scheme for translocation of reptiles and enhancement of a reptile receptor should be agreed by Wiltshire Council. The WHSAP (WHSAP.01.01²⁰), paragraph 5.141, requires that Slow Worms *'will need to be re-colonised on a suitable receptor site within the Country Park'*. This issue is discussed further under Question 5.19 below.

ii. green infrastructure and agricultural land

17. Likely effects of developing this site on green infrastructure and agricultural land have been assessed in the Sustainability Appraisal (SA.01.A.a²¹ and SA.01.A6) and the assessment does not indicate that the site should not be allocated. Minor adverse effects are considered likely against relevant SA objectives.
18. The site is relatively small at 0.48ha and is not in agricultural use. The SA Annex I (SA.01.A6) page 14 assessed likely effects on green infrastructure and found that the development of the site for housing could offer the potential to deliver green infrastructure and that this could include access to the new Country Park adjacent to the site. There would be a requirement for development to provide a buffer to any mature trees and hedgerows within and adjacent to the site. The SA Annex I (SA.01.A6) page 15 highlights that public right of way SALS31A runs along the northern boundary of the site from which there are open views of the site and is used by dog walkers frequently. Assuming this right of way remains open during construction and operation, no adverse effects are likely on the accessibility of the right of way.

¹⁵ [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

¹⁶ Memorandum of Understanding River Avon SAC Phosphate Neutral Development Interim Mitigation (HRA.03)

¹⁷ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

¹⁸ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

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

²⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

²¹ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

19. WHSAP (WHSAP.01.01²²), paragraph 5.140, states that there is a *'public right of way forming the northern boundary of the site and beyond that is the Hampton Country Park. The right of way should be maintained, and its route enhanced through additional hedge and tree planting and additional access points to the Country Park'*.
20. The SA Annex I (SA.01.A6²³) on page 6 assessed likely effects on agricultural land and concluded that *'given the scale of development and location, such a loss would be minor to negligible'*. The site consists of a narrow piece of rough grassland that is not in agricultural use, sandwiched between the new Country Park and Hilltop Way.

iii. landscape quality and character

21. Likely effects of developing this site on landscape quality and character have been assessed in the Sustainability Appraisal (SA.01.A.a²⁴ and SA.01.A6) 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. Minor adverse effects are considered likely against relevant SA objectives. SA Annex I (SA.01.A6) page 15 records that there are no landscape designations in this area and any effects on the landscape would be well contained and linked to the existing site and surroundings.
23. The Landscape Assessment Part 2 (PSCON.11B²⁷) 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 has limited character given it is a small grassed plot of land and with its relatively discreet location it is not associated with the settlements setting. There is scope to mitigate the effects of any proposed development through appropriate hedgerow and tree planting to proposed property garden boundaries and along the boundary to the PRow and adjacent land'*.
24. Stage 4a of the site selection process (TOP.02), summarised in the Salisbury CATP (CATP.13), highlights in Table G.3 that *'public right of way (PRow) SALS31A runs along the northern boundary of the site, from which there are open views of the site. This should remain open during construction and operation, if possible, and views from the PRow mitigated through use of a Green Infrastructure buffer. Access to the adjacent Country Park could also be provided from this PRow'*.
25. Taking the above evidence into account, the WHSAP (WHSAP.01.01²⁸) paragraph 5.140 requires the PRow to be maintained and its route enhanced through additional hedge and tree planting and with additional access points to the Country Park. Paragraph 5.142 notes potential for impacts on skyline views from Old Sarum Airfield Conservation Area and from Old Sarum Castle and requires that *'these will need to be mitigated through the appropriate location of new dwellings and a high quality design scheme, together with suitable landscaping and provision of open space'*.

²² [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

²³ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

²⁴ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 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

²⁷ [PSCON.11B](#) Wiltshire Housing Site Allocations Plan Stage 4a Site Landscape Assessment Part 2, June 2017

²⁸ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

iv. heritage assets

26. Likely effects of developing this site on heritage assets have been assessed in the Sustainability Appraisal (SA.01.A.a²⁹ and SA.01.A6³⁰) and in Stage 4a of the site selection process (TOP.02³¹), presented in the Salisbury CATP (CATP.13³²). 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 minor adverse effects of developing this site are considered to be reasonable and achievable.
27. The SA Annex I (SA.01.A6) on page 13 considers that, overall, there are likely to be minor adverse effects on heritage assets. It highlights that there is potential for impacts on skyline views from Old Sarum Airfield Conservation Area and from Old Sarum Castle, but these impacts can be mitigated through building type, size, design and location. The WHSAP (WHSAP.01.01), paragraph 5.142, requires any impacts to be *'mitigated through the appropriate location of new dwellings and a high-quality design scheme, together with suitable landscaping and provision of open space'*.
28. The SA also highlights that *'the site has medium to high archaeological potential, therefore an archaeological evaluation will be required. Measures are not likely to affect the scale of development on the site'*.

v. strategic and local infrastructure including transport

29. Likely effects of developing this site on strategic and local infrastructure have been assessed in the Sustainability Appraisal (SA.01.A.a³³ and SA.01.A6) and in Stage 4a of the site selection process (TOP.02³⁴), presented in the Salisbury CATP (CATP.13³⁵). The assessments do not indicate that the site should not be allocated.
30. The SA Annex I (SA.01.A6), pages 6 – 19, considers that, given the small capacity of this site, minor adverse effects are likely on water and sewerage infrastructure, local healthcare facilities, local schools and the local highway network. The Salisbury CATP (CATP.13) Table G.3 states that *'the site is in an accessible and sustainable location capable of being served by existing highways infrastructure. The site is not of a size that will significantly add to pressures on local infrastructure, services and facilities. All of the potential minor adverse effects associated with developing the site are considered to be capable of being addressed by straightforward mitigation measures'*.

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

31. 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.
32. The SA Annex I (SA.01.A6) states on page 19 that *'the development of this site for a small number of dwellings will generate minor additional vehicle movements on the*

²⁹ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

³⁰ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

³¹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

³² [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

³³ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

³⁴ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

³⁵ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

local road network, especially through private car use. There would be a likely low impact on the local road network’.

33. Stage 4a of the site selection process (TOP.02³⁶), presented in the Salisbury CATP (CATP.13) Table G.3, states that *‘development of this small site is not considered likely to lead to congestion or highway safety problems. The site is in an accessible and sustainable location capable of being served by existing highways infrastructure. The site is not of a size that will significantly add to pressures on local infrastructure, services and facilities’.*

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

34. 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.a³⁷ and SA.01.A6³⁸) and in Stage 4a of the site selection process (TOP.02³⁹), presented in the Salisbury CATP (CATP.13⁴⁰). The assessments do not indicate that the site should not be allocated.
35. The SA Annex I (SA.01.A6) pages 5 – 12 has noted minor adverse effects that are capable of being mitigated. SA Annex I (SA.01.A6) page 10 has highlighted that *‘a noise assessment would be required due to the proximity of the site to the nearby Old Sarum airfield. Mitigation measures to limit such impacts would need to be developed and implemented in accordance with local plan policy and advice from relevant bodies’.*
36. The site falls within the catchment of the Hampshire Avon, a high-risk catchment for phosphate loading. This is considered further under Issue 5.11 below.
37. Stage 4a of the site selection process (TOP.02⁴¹), presented in the Salisbury CATP (CATP.13) in Table G.3, states that *‘due to the proximity of Old Sarum airfield, a noise assessment would be required to accompany any future planning application. Any measures necessary to limit noise impacts would be incorporated in detailed design following advice from relevant expertise. This is likely to be a matter capable of resolution and unlikely to affect the dwelling capacity of the site. All of the potential minor adverse effects associated with developing the site are considered to be capable of being addressed by straightforward mitigation measures’.*

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

38. 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.a⁴² and SA.01.A6) and the assessment does not indicate that the site should not be allocated.
39. The SA has noted minor adverse effects that are capable of being mitigated. SA Annex I (SA.01.A6) on page 14 has highlighted that *‘the development of the site for housing could offer the potential to deliver Green Infrastructure’* and that *‘this could include access to the Country Park to the east of the site’.* There is no designated open space

³⁶ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

³⁷ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

³⁸ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

³⁹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴⁰ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁴¹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴² [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

or common land within the site, but provision of public open space as part of any development is possible. There will also be good access to the adjacent Country Park.

40. SA Annex I (SA.01.A6) on page 15 notes that *'PRoW SALS31A runs along the northern boundary of the site from which there are open views of the site. Assuming this right of way remains open during construction and operation, no adverse effects are likely on the accessibility of the PROW'*. The WHSAP (WHSAP.01.01⁴³), paragraph 5.140, states that *'the right of way should be maintained and its route enhanced through additional hedge and tree planting and additional access points to the Country Park'*.
41. Stage 4a of the site selection process (TOP.02⁴⁴), presented in the Salisbury CATP (CATP.13⁴⁵) Table G.3, states that *'access can be provided from this site to the adjacent Country Park, thereby providing potential health benefits to future residents'*.

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. It is considered that the plan does contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development. The supporting text to site allocation H3.2 paragraphs 5.139 – 5.142 provides contextual detail which will guide future developers and decision makers and inform mitigation measures that may be required. These measures include addressing issues regarding the existing public right of way, presence of reptiles on site and potential for impacts on skyline views from Old Sarum Airfield Conservation Area and Old Sarum Castle.
43. The site will be developed in accordance with existing policies set out in the Wiltshire Core Strategy (WCO.01⁴⁶), 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?

44. The WHSAP (WHSAP.01.01⁴⁷) does not include specific contributions for this site. Stage 4a of the site selection process (TOP.02⁴⁸), presented in the Salisbury CATP (CATP.13) in Table G.3, states that *'the site is not of a size that will significantly add to pressures on local infrastructure, services and facilities'*. However, requirements for infrastructure contributions will be subject to review through the consideration of future planning applications submitted on the site.
45. WHSAP (WHSAP.01.01 and EXAM.01.01⁴⁹) 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)'*.

⁴³ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁴⁴ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴⁵ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁴⁶ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁴⁷ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁴⁸ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴⁹ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

46. WHSAP (WHSAP.01.01⁵⁰ and EXAM.01.01⁵¹) paragraph 5.128 specifically mentions the refresh of the Salisbury Transport Strategy (WHSAP.08⁵² and WHSAP.08A⁵³). It states *'development inevitably has impacts on the local transport network. The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS. Development will contribute to these wider network measures, where necessary...'* It is not considered likely that development of this relatively small site for approximately 10 dwellings will significantly impact on the local highway network.

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?

47. This site is in an accessible location with good access to a range of facilities by a range of different transport modes. The site is adjacent to the existing settlement boundary of Salisbury, approximately 2km from the city centre.
48. There are bus routes to the city centre within approximately 100m of this site. From the nearest bus stop, the R4 'Salisbury Reds' service connects to Salisbury City Centre. This provides regular services from Monday to Saturday throughout the day. Hence there is no deficiency in the locality that is required to be addressed in this case.
49. Stage 4a of the site selection process (TOP.02⁵⁴), presented in the Salisbury CATP (CATP.13⁵⁵) in Table G.3, states that *'vehicular access would be achieved via St Francis Rd and Hilltop Way. The site is in an accessible and sustainable location capable of being served by existing highways infrastructure'*.

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?

50. The submission version of the WHSAP (WHSAP.01.01) 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.
51. 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.01⁵⁶).

⁵⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁵¹ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁵² [WHSAP.08](#) Salisbury Transport Strategy Draft Strategy Refresh 2018, July 2018

⁵³ [WHSAP.08A](#) Salisbury Transport Strategy Draft Strategy Refresh 2018 Summary, June 2018

⁵⁴ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁵⁵ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁵⁶ [WCO.01](#) Wiltshire Core Strategy, January 2015

52. 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?

53. The proposed allocation is considered to be deliverable in the timescales envisaged.

54. This site is identified within Wiltshire Council's Strategic Housing Land Availability Assessment (SHLAA2012.12⁵⁷), under site reference S61. The assessment confirms that the land is 'deliverable', i.e. that the land is available now with a realistic prospect of being viably developed for housing within five years. 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?

55. With regards this site at Hilltop Way, the evidence base has shown no potential impacts of development on the setting of Salisbury Cathedral.

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?

56. 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.05.01⁵⁸ – HRA.05.04⁵⁹) 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.

57. The SAC Nutrient Management Plan (NMP) (BIO.19⁶⁰) 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.01⁶¹) in a way that was consistent with Habitats Regulations.

58. The role of the NMP (BIO.19) has been supplemented by the IDP (HRA.05.01 – HRA.05.04) 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).

⁵⁷ [SHLAA2012.12](#) Strategic Housing Land Availability Assessment Appendix 3 – Salisbury, July 2013

⁵⁸ [HRA.05.01](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

⁵⁹ [HRA.05.04](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

⁶⁰ [BIO.19](#) River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁶¹ [WCO.01](#) Wiltshire Core Strategy, January 2015

59. The WHSAP (WHSAP.01.01⁶² and EXAM.01.01⁶³) will be delivered alongside the IDP (HRA.05.01⁶⁴ – HRA.05.04⁶⁵) 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.03) 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.01⁶⁶) Core Policy 3.

Issue 5.19 - The supporting text for Sites H3.2 and H3.5 refers to the likely need to translocate populations of slow worms to other sites. Is this approach consistent with national policy? What is the evidence that such sites exist and would be effective in providing mitigation?

60. It is considered that the approach to reptile (Slow Worm) translocation is consistent with national policy.

61. The WHSAP (WHSAP.01.01) paragraph 5.141 states that *‘the site has been shown to have a high population of reptiles (Slow Worms) and these will need to be re-colonised on a suitable receptor site within the Country Park. 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’*.

62. There is evidence of a 0.22ha piece of land in the landowners’ ownership, adjacent to the site, that can be used as an effective receptor site and which can be transferred into the ownership of Laverstock and Ford Parish Council as an extension to the adjacent Country Park.

63. This site is subject to an existing outline permission (planning application 16/04126/OUT granted through allowed appeal decision ref APP/Y3940/W/17/3173509) (PH.08C⁶⁷). This site was then subject to an application to vary a condition regarding affordable housing (planning application ref 18/07328/VAR). This was approved (PH.08B⁶⁸) at Wiltshire Council Southern Area Planning Committee on 13th December 2018. This permission includes the same conditions with regards reptile translocation as the previous permission, as follows:

‘13) No development can commence until a scheme for the provision and management of compensatory habitat creation (as an extension to the proposed Hampton Park Country Park to provide a receptor site for existing reptiles) has been submitted to and approved in writing by the local planning authority. The scheme shall include the 0.22 ha of land in the Appellant’s ownership to the south-east of the development (shown in green as ‘Country Park’ on the plan on page 11 of the Design and Access Statement).

⁶² [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁶³ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁶⁴ [HRA.05.01](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

⁶⁵ [HRA.05.04](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

⁶⁶ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁶⁷ [PH.08C](#) Appeal Decision APP/Y3940/W/17/3173509 Land North of Hilltop Way, Salisbury, August 2017

⁶⁸ [PH.08B](#) Southern Area Planning Committee Minutes of Committee Meeting, December 2018

The scheme shall be completed in accordance with the approved details, before development is first occupied, or in accordance with the approved timetable in the approved scheme. The receptor site shall be retained for that purpose in perpetuity.

14) *Before works commence, a mitigation scheme for the translocation of reptiles and enhancement of the reptile receptor site shall be submitted to and approved in writing by the local planning authority. The scheme will identify the receptor site, specify how it will be prepared and confirm elements of the scheme which will be undertaken and/or overseen by an ecologist. The works will be completed in accordance with the approved scheme.*

15) *At no time before, during or after the construction of the development, will land to be made available for the Hampton Park Country Park shown on the illustrative masterplan (Savills, Job. No. WIPL350874 Drawing L002) be used for temporary or construction works.'*

64. In condition 13 above, the 0.22ha piece of land stated as being in the appellant's ownership is adjacent to the H3.2 Hilltop Way site allocation and adjacent to the Country Park.