

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H3.7 Larkhill Road, Durrington

PS/M3/67

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Contents

Matter 3: Housing Site Allocations H3.7 Larkhill Road, Durrington		Page number
<i>Issue No.</i>	<i>Issue</i>	
5	Are the proposed sites justified, effective and consistent with national policy?	4
5.1	Does the plan provide sufficient detail on form, scale, access and quantity of development for each site?	4
5.2	Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?	4
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	5
	ii. green infrastructure and agricultural land	6
	iii. landscape quality and character	7
	iv. heritage assets	7
	v. strategic and local infrastructure including transport	8
	vi. the efficient operation of the transport network, highway safety	8
	vii. air and water quality, noise pollution, odours, land stability, groundwater and flood risk	8
	viii. open space, recreational facilities and public rights of way	9
5.4	In relation to the above, does the plan contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development?	9
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?	10
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?	10
5.7	In cases where allocations do not have specific policies, is the reliance on supporting text likely to be an effective	11

	means of delivering the Council's requirements for each site? What is the justification for some sites having specific policies and some not?	
5.8	Is the development proposed for each site deliverable in the timescales envisaged?	11
Area specific issues		
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?	11

**Matter 3: Housing Site Allocations
H3.7 Larkhill Road, Durrington**

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. Policy H3 and allocation H3.7 of the Wiltshire Housing Site Allocations Plan (WHSAP) Submission Document (WHSAP.01.01¹) and supporting text, incorporating the Council's Schedule of Proposed Changes (EXAM.01.01²), when read in conjunction with the introductory supporting text in Chapter 5 of the Plan (paragraphs 5.1 to 5.12) provide sufficient detail. The introductory supporting text clarifies that the policies of the Wiltshire Core Strategy (WCO.01³) will also apply in considering the development of the site. When taken together with the Core Strategy, the Council considers the Plan provides sufficient detail on form, scale, access and quantity of development.
2. The quantity of development to be delivered is established in policy through the Plan as being approximately 15 dwellings on a site area of approximately 0.8ha which is considered to be achievable for the site.
3. Moreover, the supporting text to H3.7 identifies a number of important elements that will need to be incorporated into development proposals (paragraph 5.157-5.158). These include specific details in respect of layout, which must replicate the character and pattern of existing development along the frontage characteristic to Larkhill Road. Details are set out to guide landscaping of the site, in order to soften the southern edge of the site to the open countryside.
4. The Plan does not include specific details about access for this site as there are no particular access concerns for this site. Access considerations were assessed through the site selection process and it is considered that a safe and suitable access can be achieved at this site as set out in the Amesbury Community Area Topic Paper (CATP) at p132 (CATP.01⁴).
5. Therefore, when read as a whole, the Council considers that the level of detail provided in the Plan is sufficient for the purpose of providing the necessary certainty to local communities and developers without being overly prescriptive.

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. The Council considers that the amount of development proposed for the site (approximately 15 dwellings) is justified by the evidence base (TOP.02⁵, CATP.01,

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

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

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

⁴ [\[CATP.01\]](#) Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

⁵ [\[TOP.02\]](#) Topic Paper 2: Site Selection Process Methodology – Submission version July 2018.

SA01A.a⁶, SA01.A2⁷) and has had full regard to site specific constraints including: drainage, flood risk, heritage, landscape and ecology, and infrastructure requirements.

7. The SHELAA (SHLAA 2011 Methodology (SHELAA.22⁸)) site capacity was estimated at 160 dwellings for this site (SHLAA 3179) (SHLAA Amesbury Appendix (SHLAA2012.01⁹)), which formed a starting point for assessment using 30 dwellings per hectare and applying a multiplier to reduce the developable area to allow for non-housing uses.
8. Stage 2 of the WHSAP site assessment process considered whether exclusionary criteria (such as Flood Zone 2/3) (TOP.02¹⁰) should result in a reduction of the SHLAA site capacity. In the case of H3.7, the site capacity was reduced from 160 to 143 dwellings due to the site's partial location within a Flood Zone (Amesbury CATP, Table D.3, p62) (CATP.01¹¹).
9. The more detailed assessment of constraints identified through the Sustainability Appraisal (SA01.02), and subsequent assessment (CATP.01, G, p131) led to a further reduction. This was primarily due to the impacts on landscape and heritage (discussed below) as well as the capacity of infrastructure to accommodate new development.
10. The infrastructure requirements for this site were related to the necessary and achievable expansion of the secondary school and health facilities, and the fact that the primary school cannot be expanded. In addition, water supply and drainage infrastructure will need to be upgraded at Durrington, which is considered achievable. Key infrastructure requirements are identified in the plan, for this particular site, on page 68. Infrastructure requirements will be confirmed through the planning application process according to up to date evidence at the time.

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

11. Wiltshire Council considers that any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
12. The Sustainability Appraisal (SA) for this site (SA.01A.02) was informed by a settlement level Habitats Regulation Assessment (HRA.01¹²) which concluded that the relationship of the site with the River Avon Special Area of Conservation (SAC) and Salisbury Plain Special Protection Area (SPA) could contribute to in-combination effects and that appropriate assessment would be required. Subsequently the council produced an Addendum under the Habitats Regulations (HRA.02¹³), and a further

⁶ [SA.01.A.a] Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁷ [SA01.02] Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

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

⁹ [SHLAA.01] SHLAA 2012, Appendix-3 Amesbury

¹⁰ [TOP.02] Topic Paper 2: Site Selection Process Methodology – Submission version July 2018.

¹¹ [CATP.01] Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

¹² [HRA.01] Habitats Regulations Assessment - Pre-submission draft plan, June 2017

¹³ [HRA.02] Addendum to the HRA, May 2018

Addendum (HRA.02a¹⁴) to support the council's Schedule of Proposed Changes, which provided the further assessment that was required for both matters.

13. The likely effects on the River Avon SAC are related to water abstraction and the discharge of phosphates. Informed by early assessment under the HRA Regulations, text was included at paragraph 5.152 of the Plan to address the need to review water abstraction and provide any necessary upgrades prior to development. In relation to the discharge of phosphates, Wiltshire Council has undertaken further assessment and carried out work in conjunction with Natural England and the Environment Agency, taking account of their comments on the Pre-submission draft of the Plan. It was agreed that additional wording should be inserted into the Plan to provide greater certainty over the need to provide for phosphate neutral development. This has been agreed through a Memorandum of Understanding (HRA.03¹⁵) which has informed a proposed change to the Plan (PC35), as set out in the Schedule of Proposed Changes (EXAM01.01¹⁶). Wiltshire Council considers that the potential impacts are addressed through the supporting text of the Plan at paragraph 5.5 (as amended). The issue of phosphate discharge to the River Avon is discussed in more detail below, in the Council's response to Issue 5.11.
14. The likely effects on the Salisbury Plain SAC relate to the increased visitor pressure on the stone curlew population. The Addendum under the Habitats Regulations (HRA.02a) confirms that the council has updated the HRA and Mitigation Strategy for Salisbury Plain SPA (HRA.04¹⁷) to take account of the latest visitor survey results and stone curlew monitoring, and there are no recommendations for changes to policies or supporting text in the Plan.
15. These effects and additional biodiversity aspects at the site were assessed through the Sustainability Appraisal (SA.01A.2¹⁸) (p40), summarised in the Amesbury CATP at Appendix F, table F.6, p97, and Appendix G, p132 (CATP.01¹⁹). The assessment concluded that development might need to include protection measures and enhancement of local habitats, due to the presence of BAP Priority Habitat at the southern boundary of the site, however due to other constraints, this area of the site was not allocated for development.

ii. green infrastructure and agricultural land

16. Green infrastructure (GI) aspects were assessed through Sustainability Appraisal (SA.01A.2) (p52-54) and subsequent assessment at Stage 4 (Amesbury CATP, Appendix G, p131). The impacts of development of this site in relation to green infrastructure are related to the location of the site at the rural fringe. Mitigation measures were suggested to incorporate GI into any subsequent development proposals. It should be noted that the SA assessment reports discuss features and mitigation that are relevant to the entire site that was assessed, but are not relevant to

¹⁴ [\[HRA.02.a\]](#) Addendum to the HRA, May 2018 (Factual Update - September 2018)

¹⁵ [\[HRA.03\]](#) Memorandum of Understanding - River Avon Special Area of Conservation Phosphate Neutral Development - Interim Mitigation

¹⁶ [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - September 2018 (Part 1 of 46)

¹⁷ [\[HRA.04\]](#) HRA and Mitigation Strategy for Salisbury Plain SPA in Relation to Recreational Pressure from Development

¹⁸ [\[SA01.02\]](#) Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

¹⁹ [\[CATP.01\]](#) Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

the allocated portion of the site. Being at the rural fringe the allocation would need to incorporate trees to filter views to and from the site.

17. The (SA.01A.2²⁰) (p53) states that development of the site offers potential to contribute towards the delivery of a comprehensive network of green infrastructure and retention of hedgerows. The supporting text of the Plan (paragraph 5.158) sets out the requirements for the site in relation to green infrastructure. There is no evidence to suggest that mitigation measures are not achievable. Development proposals will be considered in the context of requirements set out in WCS Core Policy 52 (WCO/01²¹).
18. Agricultural land was considered and evaluated in the Sustainability Appraisal (SA.01A.2) (p43) on the basis of available evidence and the impact was considered to be minor to negligible. There is no evidence to indicate that the site should not be allocated.

iii. landscape quality and character

19. Landscape aspects were assessed through the Sustainability Appraisal (SA.01A.2) (p52-54), and subsequent assessment at Stage 4 (Amesbury CATP, Appendix G, p131 (CATP.01²²)). The landscape impacts of the entirety of SHLAA site 3179 were assessed as sensitive and mitigation measures were suggested which included reducing the area of the site. The sustainability appraisal assessment was therefore scored as minor adverse as this mitigation was considered to be wholly achievable, specifically through limiting development to the upper part of the site, within the current line of residential built form to the south of Larkhill Road, as informed by the detailed landscape assessment (PSCON.11.A²³). There is no evidence to indicate that the site should not be allocated as per the proposed site area.
20. Paragraphs 5.158 provides guidance on the landscaping elements that need to be incorporated, which would be supported by the requirements of WCS Core Policy 51 and 52. In conclusion, it is considered that mitigation measures to address landscape quality and character are deliverable and capable of being fully addressed through landscape assessment informing development proposals and submitted as part of any future planning application, in line with WCS Core Policy 51 and there is no reason that the site should not be allocated.

iv. heritage assets

21. Heritage aspects were assessed through the Sustainability Appraisal (SA.01A.2) (p51-52) and subsequent assessment at Stage 4 as set out in the Amesbury CATP (CATP.01) (Appendix G, p132) and mitigation measures were suggested which included reducing the area of the site, due to the likely impact on the setting of the World Heritage Site, Durrington Walls and Woodhenge, and the impact on the historic landscape. Subsequently the area of the site was substantially reduced to the current proposed area of the allocation.

²⁰ [\[SA01.02\]](#) Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

²¹ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

²² [\[CATP.01\]](#) Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

²³ [\[PSCON.11.A\]](#) The Environment Partnership. Wiltshire Housing Site Allocations Plan, Stage 4a, Site Landscape Assessment, Part 1. June 2017.

22. There is no evidence to indicate that the site should not be allocated as per the proposed site area.

v. strategic and local infrastructure including transport

23. The requirement to consider strategic and local infrastructure requirements is set by WCS Core Policy 3. Core Policy 3 provides a sound and suitable approach to ensuring that the development of the Upper Studley site will provide for essential and place-shaping infrastructure where it is needed, in a timely manner.
24. Strategic and local infrastructure aspects were assessed through the Sustainability Appraisal (SA.01A.2²⁴) (p.55-56) and subsequent assessment at Stage 4, as set out in the Amesbury CATP (CATP.01²⁵) (Appendix G, p131) and mitigation measures were suggested for any subsequent development proposals. Development at this site would result in the need to mitigate pressure on health facilities. The assessment also identified that the local primary school was at capacity with no further potential for expansion, limiting the number of dwellings that could be allocated at Durrington, which aligns with the scale of development at this site. The secondary school would need to be expanded. It is considered that mitigation measures are possible and there is no evidence to indicate that the site should not be allocated.
25. As discussed in the relevant sections, in relation to potential impacts on biodiversity and groundwater, water drainage and supply infrastructure upgrades will need to be informed by the relevant assessments and incorporated into the proposals. The Water Industry Act 1991 ensures that the necessary infrastructure will be in place prior to development.
26. The Council considers that the planning application process will allow for relevant assessments informing development proposals and submitted with a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3.

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

27. The efficient operation of the transport network and highway safety were considerations in Stage 4 of the site selection process and there is no evidence to indicate that the site should not be allocated.
28. General congestion issues at Durrington and the need to improve cycle and pedestrian connectivity were considerations set out in the Amesbury CATP (Appendix G, p123 (CATP.01)). For this particular allocation of approx. 15 dwellings with onsite parking, there were no significant potential impacts on the transport network and highway safety.

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

29. Air and water quality, noise pollution, odours, groundwater and flood risk were all considered through the Sustainability Appraisal (SA.01A.2). Specific constraints were identified for this site, which include its location with a Groundwater Protection Zone 1

²⁴ [\[SA01.02\]](#) Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

²⁵ [\[CATP.01\]](#) Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

and in close proximity to the River Avon and Flood Zone 2 and 3. Mitigation measures related to the choice of water management techniques are relevant and considered to be achievable. Comments made by the Environment Agency through the Pre-Submission Consultation (Regulation 22 Report, WHSAP.09²⁶, p23 and WHSAP.11²⁷, p191) in relation to groundwater protection have been taken in to consideration, and the Plan is proposed to be changed (PC118) to include additional text, as set out in the Schedule of Proposed Changes (EXAM.01.01²⁸).

30. The site is within the catchment of the River Avon and mitigation as per the Memorandum of Understanding on Phosphate Neutral Development (HRA.03²⁹) will be relevant and is considered achievable (as discussed elsewhere in this document). Proposals will need to be informed by the appropriate assessment and MoU as well as extensive testing on site in relation to drainage.
31. In light of the requirements of the NPPF in relation to land stability, there are no known issues of concern in relation to this site. A noise assessment would be required for this site due to the adjacent industrial use, however there is no evidence to indicate that development would not be possible.
32. Air quality, noise, odours and vibration associated with construction as well as any impacts caused by or affecting the residential use have also been considered and the effects identified can be fully mitigated through application of existing policy and regulations. Mitigation measures to limit the impacts of vehicular movements on local air quality would need to be developed and implemented in accordance with local plan policy and advice from relevant bodies.

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

33. The provision, protection and enhancement of open space, recreational facilities and public rights of way have been assessed through the Sustainability Appraisal (SA.01A.2³⁰) (p52-53). The site will be required to deliver open space, appropriate to its size. There are no specific considerations in relation to public rights of way but the site is considered to be have the ability to contribute to the protection and enhancement of the existing rights of way network, open spaces and common land, as appropriate. This is supported by the existing green infrastructure requirements set out in WCS Core Policy 52.

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?

34. Chapter 5 of the Plan, including Policy H3, allocation H3.7 and their supporting text (with Proposed Changes 117 and 118) are considered to provide contextual detail that will guide future developers and decision makers and thereby inform mitigation measures required to support development. Reference is made to the need to develop proposals in accordance with existing policies set out in the Wiltshire Core Strategy

²⁶ [\[WHSAP.09\]](#) Consultation Statement Regulation 22 (1) (c) Submission version July 2018.

²⁷ [\[WHSAP.11\]](#) Consultation Statement Regulation 22 (1) (c) Appendix M. July 2018

²⁸ [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - September 2018 (Part 1 of 46)

²⁹ [\[HRA.03\]](#) Memorandum of Understanding - River Avon Special Area of Conservation Phosphate Neutral Development - Interim Mitigation

³⁰ [\[SA01.02\]](#) Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

also, 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?

35. WHSAP (WHSAP.01.01³¹ and EXAM.01.01³²) paragraphs 5.1 – 5.12 introduce a range of generic requirements that may be required for each site. Paragraphs 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)'*.
36. 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.
37. Paragraph 5.150 of the Plan refers to the need to upgrade water supply network at Durrington in order to accommodate further growth, and that upgrades may need to be in place before development can commence.
38. The Sustainability Appraisal identified the need for development at Durrington to contribute to health facilities and school provision to meet the needs of the new development. Details are documented in the Amesbury CATP, Appendix G (CATP.01³³).
39. The Sustainability Appraisal and consultation with relevant bodies indicated the need to review water infrastructure at Durrington, in relation to foul water drainage and water supply. In relation to the Larkhill Road site (H3.7), it is understood that mains drainage has been recently installed adjacent to the site which would facilitate timely development.
40. The Council considers that existing the planning application process will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3.

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?

41. The accessibility of the proposed allocation assessed through Stage 2 (under 'land developable', Table D.3) and Stage 4 of the site assessment process (CATP.01, Appendices D and G). Assessment of each site considered the following factors: accessibility to local bus services, rail stations and service centres; likely impacts on the local road network; site access arrangements and impacts.
42. The site is considered to be in a location that is within walking and cycling distance of the services and facilities of Durrington. Amesbury is within cycling distance however

³¹ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

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

³³ [\[CATP.01\]](#) Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

there would need to be upgrades to the cycle routes. The site is in walking distance of bus stops that serve the town centre as well as towns further afield.

43. While residents are likely to use private vehicles, there are opportunities through the planning application stages to ensure that development of the site incorporates infrastructure to improve cycling opportunities (such as garages, sheds and secure bike stands) in accordance with WCS Core Policy 60.

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?

44. The submission version of the WHSAP (WHSAP.01.01³⁴) explains at paragraph 5.12 that allocations are proposed at some settlements that involve a mix of uses or site specific complexities and where it is more appropriate for development to be guided by a master plan approach, as opposed to detailed matters being addressed through policy criteria. There are five sites, of which this site is one, that have been identified as requiring a master plan.
45. The remaining sites are allocated by Policies H2 and H3. Due to their less complex nature, these sites were not considered to require a master planned approach, and thus do not have a specific policy. The supporting text to the allocated sites provides future developers and decision makers with important contextual information regarding matters that will need to be addressed through the planning application process. Indeed, as set out Chapter 5 of the WHSAP (WHSAP.01.01), the Council anticipates that development proposals relating to all allocations will be guided by relevant policies of the Wiltshire Core Strategy (WCO.01³⁵).
46. 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?

47. Yes the Council considers the proposed allocation can be delivered within five years. Wiltshire Council's latest assessment SHELAA³⁶ indicates 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. The more detailed assessment carried out through the WHSAP site selection process has considered a full range of constraints and it has concluded that development is likely to be deliverable within a 5-year timescale. This position has been confirmed by the developer.

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?

48. 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

³⁴ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

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

³⁶ [\[SHELAA.02\]](#) SHELAA Appendix 5.1 Amesbury Community Area

and Wessex Water, alongside other planning authorities in the catchment, measures have been identified in an Interim Delivery Plan (HRA.05.01³⁷, HRA.05.02³⁸, HRA.05.03³⁹, HRA.05.04⁴⁰) that can deliver mitigation measures sufficient to make a reduction in phosphate at least equivalent to the forecast additional load from all development in the catchment. Importantly, these measures will, however, only be necessary as a contingency to a commitment from Wessex Water to peg phosphate levels at recent average levels (one of Company's Business Plan Outcome Delivery Incentives). The latter largely achieves phosphate neutrality of itself. The EA and NE therefore have realistic expectations.

49. The SAC Nutrient Management Plan (NMP) (BIO.19⁴¹) 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.01⁴²) in a way that was consistent with Habitats Regulations.
50. The role of the NMP (BIO.19) has been supplemented by an Interim Delivery Plan (HRA.05.01, HRA.05.02, HRA.05.03, HRA.05.04) and Wessex Water Outcome Delivery Incentive (see above) as means to achieve phosphate neutrality. These instruments became necessary when, since preparation of the NMP (BIO.19), it became apparent, that reductions to levels of phosphate to the SAC, relying in large part on voluntary improvements to farming practice, were not being achieved to the extent intended by the NMP (BIO.19).
51. The WHSAP (WHSAP.01.01⁴³ and EXAM.01.01⁴⁴) will be delivered alongside the Interim Delivery Plan (HRA.05.01 - HRA.05.04) and Outcome Delivery Incentive. Housing development proposed within the WHSAP (WHSAP.01.01 and EXAM.01.01) is accounted for within overall forecast development, both residential and non-residential, on which both the Interim Delivery Plan (HRA.05.01 - HRA.05.04) and Outcome Delivery Incentive are based. The main source of funding for off-site mitigation is from the Community Infrastructure Levy, as specified on the Council Regulation 123 list. The Memorandum of Understanding (HRA.03⁴⁵) makes clear that on large schemes the Council will seek on site mitigation measures to help mitigate the effects of development. The Interim Delivery Plan (HRA.05.01 - HRA.05.04) describes on-site measures that can be explored. Individual WHSAP (WHSAP.01.01 and EXAM.01.01) proposals are not at a level of detail for it to be sensible to prescribe measures as part of a proposal; nor might this allow sufficient flexibility even if they were. The general principle as a foundation for the approach already exists in WCS (WCO.01) Core Policy 3.

³⁷ [\[HRA.05.01\]](#) River Avon SAC - Phosphate IDP (Main Report)

³⁸ [\[HRA.05.02\]](#) River Avon SAC - Phosphate IDP (App A Figs 1-16)

³⁹ [\[HRA.05.03\]](#) River Avon SAC - Phosphate IDP (App A Figs 17-40)

⁴⁰ [\[HRA.05.04\]](#) River Avon SAC - Phosphate IDP (App B)

⁴¹ [\[BIO.19\]](#) River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁴² [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

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