

**Wiltshire Housing Site Allocations Plan
Submission Draft Plan – July 2018**

Statement of Common Ground between:

Wiltshire Council

and

**Savills on behalf of Bellway Homes Limited
(Wessex)**

**(Ref. Policy H.3, site allocation H3.4 Land at
Rowbarrow)**

March 2019



1. Introduction

1. This Statement has been prepared to assist in the forthcoming Examination in Public into the Wiltshire Housing Site Allocations Plan - Submission Version July 2018 (hereafter referred to as 'the WHSAP') and the Schedule of Proposed Changes - Submission Version July 2018.
2. Bellway Homes Limited (Wessex) (Bellway) and Wiltshire Council (the Council) (the parties) have identified a number of areas of common ground. These are set out in this Statement to assist the Inspector and the Examination process.
3. The Statement identifies those areas of agreement between the parties in relation to the overall strategy of the Plan and specifically to the consideration of Policy H3, site allocation 3.4 'Land at Rowbarrow, Salisbury'.

2. Matters of agreement

4. The following objectives are established in the Submission version of the WHSAP and supported by the parties:

Objective 2: To help demonstrate a rolling five-year supply of deliverable land for housing development – a duty on each Local Planning Authority required by the NPPF.

Objective 3: To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy. The spatial strategy for Wiltshire contained in the Core Strategy promotes sustainable development in the County.

5. Paragraph 3.6 states that:

“The plan must identify a number of greenfield sites involving the loss of countryside to achieve this objective.”

6. The parties agree that Land at Rowbarrow is one such site that the WHSAP appropriately identifies for residential development to help meet these objectives.
7. The parties also agree that the allocation of Land at Rowbarrow for residential development supports the spatial strategy of the Wiltshire Core Strategy. This is in line with paragraph 3.7, which recognises that Salisbury is a Principal Settlement identified in the hierarchy of settlements in the spatial strategy of the Wiltshire Core Strategy (WCS) (Core Policy 1).
8. Core Policy 1 of the WCS goes on to state that: *“Wiltshire’s principal settlements are strategically important centres and the primary focus for development”* and Core Policy 20 deals with the Salisbury Community Area, where Land at Rowbarrow is situated and states that:

“Over the plan period (2006 to 2026)...approximately 6,060 new homes will be provided within the Community Area, which should occur either within Salisbury or the town of Wilton, including land identified for strategic growth...”

9. The policy continues:

“Growth in the Salisbury Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2” and that

“Development Proposals in the Salisbury Community Area will need to demonstrate how those issues and considerations listed in paragraph 5.112 will be addressed.”

10. The following matters identified in paragraph 5.112 of the Core Strategy are relevant to the identification of the Rowbarrow site:

- Approximately 100 additional dwellings at the Rowbarrow site, with their residents’ additional spending power, would help ensure that *“Salisbury can maintain its place as an important retail centre in the face of intense sub-regional competition...”*
- *“Broad areas of search for future development around Salisbury are mapped in Topic Paper 19 (see map “Potential Areas for Strategic Growth in and around Salisbury/Wilton”)*. The parties agree that Land at Rowbarrow is within the map identified in that document (WCO.29a and WCO.29b).
- *“Development in the vicinity of the River Avon (Hampshire) must incorporate appropriate measures to ensure that it will not adversely affect the integrity of those Natura 2000 sites”*. It is agreed that the phosphates issue is capable of being resolved, as referred to below.
- *“A mix of housing and employment growth will facilitate the delivery of improved infrastructure and community facilities in Salisbury through developer contributions.”* The parties agree that approximately 100 dwellings on land at Rowbarrow would be of a scale where developer contributions are likely for necessary infrastructure to meet the needs generated by the development subject to meeting the necessary legal tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, and that paragraphs 5.1 – 5.12 of the WHSAP include requirements and considerations that must be considered for all site allocations, with further considerations specific to Salisbury allocations set out in paragraph 5.128.
- *New secondary school capacity is also needed for Salisbury and this will initially be met through extension and rationalisation of the existing schools with a longer-term aspiration for a new secondary school.* The parties agree that the Rowbarrow site will likely be required to make financial contributions to education provision subject to meeting the necessary legal tests, taking into account paragraph 5.149 of the WHSAP.
- *The cumulative impact on all strategic development sites at Salisbury will need to be considered in transport assessments for major developments.* The parties agree that the WHSAP, at paragraph 5.128, and Proposed Change PC97 refer to the refresh of the Salisbury Transport Strategy (2018) and that development at Salisbury will contribute to wider transport network measures, where necessary, alongside measures that are implemented expressly as part of the Rowbarrow Site.

11. The Landowner submitted a Transport Report (September 2017) to the Council as part of their representation to the consultation on the Pre-submission WHSAP. The conclusion states:

- *The location of the site in relation to both the local pedestrian and cycle network and the existing public transport infrastructure presents a good opportunity to promote sustainable travel and encourage sustainable development.*
- *The trips have been distributed on to the local road network ... If this site were allocated, this location in relation to the strategic network provides an opportunity to reduce the number of vehicles travelling through the New Bridge Road roundabouts and into Salisbury City Centre. The trip generation demonstrates that 38% of all development traffic would not be anticipated to use either of the Newbridge roundabouts.*
- *Access to the site would most appropriately be served via a right turn lane And will provide the opportunity to improve pedestrian connectivity by providing a pedestrian refuge island across Odstock Road.*
- *This report has demonstrated that the site provides a good opportunity to encourage Wiltshire Council to allocate the site in the submission Housing Site Allocations Plan.*

12. The WHSAP, at paragraph 5.146, acknowledges that the development of the Rowbarrow site would provide housing in a location with a reasonable level of access to the local services and facilities in Salisbury city centre. It recognises that there is a frequent bus service within 100m of the site and the Park & Ride is in close proximity.

How were sites selected?

13. The methodology for the selection of sites is explained in Topic Paper 2 of the WHSAP on Site Selection Process Methodology which highlights the following process:

Stage 1: Areas of Search

Stage 2: Strategic Assessment

Stage 3: Sustainability Appraisal

Stage 4: Selection of Preferred Sites and developing Plan Proposals

Stage 5: Viability Assessment

Stage 6: Sustainability Appraisal of Plan proposals and Habitats Regulations Assessment

14. Topic Paper 2 states Community Area Topic Papers report on stages 1 to 4a.

15. Community Area Topic Paper - Salisbury (July 18) gives the Council's approach to site selection for this area. This Topic Paper highlights the following issues for consideration for Land at Rowbarrow in paragraph 5.40:

- *Significance of heritage assets*
- *Visual character of the wider countryside*
- *Measures to address these issues would reduce dwelling capacity to approximately 100 dwellings.*
- *The site is prominent and includes a scheduled ancient monument. Extending existing landscape features and setting aside land from development are*

amongst mitigation measure considered capable of achieving an acceptable form of development with the significant exception of lack of local primary school capacity. Without such capacity overall sustainability is marginal.

- *With additional primary education capacity, adverse effects can be resolved by carefully considered mitigation measures. If this is the case, the overall sustainability benefits of allocating this site for development would be considered to be good given the scope for affordable housing on the site.*

16. The Rowbarrow site was assessed by the Council on 12 sustainability criteria in their Sustainability Appraisal Report (May 2018) as a 'more sustainable' site and proceeded to the next stage of the plan-making process as described in the Salisbury Community Area Topic Paper. The parties agree that through the Council's site selection process which took account of relevant, up-to-date evidence, the Council were sufficiently confident that any adverse impacts of developing this site could be adequately mitigated to enable the Council to include Rowbarrow as a proposed housing site allocation for approximately 100 dwellings.

17. The aim of Stage 5 Viability Assessment, as set out in Topic Paper 2 is:

"To ensure preferred sites are viable and capable of development in accordance with national policy Requirements." It goes on to state:

"Viability assessment has verified that preferred sites and the scale of development identified in the plan are not subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It also shows that preferred sites are capable of providing policy compliant levels of affordable homes and that they are capable of contributing fully to the WCS target for the plan period. Assessment has been carried out by independent experts on this aspect and their report has been published separately."

18. The parties agree that the development of Land at Rowbarrow for approximately 100 dwellings would be viable taking into consideration the nature of the site and policy requirements including contributions consistent with Core Policy 3 of the WCS.

19. Stage 6 relates to the Sustainability Appraisal of the Plan as a whole and further consideration of impact on European sites consistent with the Habitat Regulations.

20. An assessment has been made by the Council in order to fulfil its statutory obligations under the Habitats Regulations and demonstrate that the Wiltshire Housing Site Allocations Plan would not have an adverse effect on the integrity of the Natura 2000 network either alone, or in combination with other plans and projects. This assessment has been made on the basis of the best available scientific knowledge. The River Avon SAC phosphate issue is covered in this document and an addendum to the HRA (September 2018) 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 [on phosphates] 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 Proposed Change PC98 and is agreed. This will allow phosphate neutral development to take place within the river catchment.

21. For Land at Rowbarrow the parties agree that that phosphate issues with regards the River Avon SAC are capable of being resolved satisfactorily to ensure that there are no significant effects on European Sites under the Habitat Regulations.

WHSAP requirements for Land at Rowbarrow, Salisbury (Site allocation H3.4)

22. Section 5 of the Plan deals with Housing site allocations. Paragraphs 5.1 – 5.12 list requirements that developers of the allocated sites will have to have regard to in the WCS, and identifies Land at Rowbarrow in Policy H3, alongside a list of other sites for the South Wiltshire HMA. Paragraph 5.126 makes it clear that: *“The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.”* For sites at Salisbury, including the Rowbarrow site, paragraph 5.128 clarifies that Transport, Biodiversity and Education will be particular considerations that need to be addressed for housing to be accommodated.
23. More detailed considerations for site allocation H3.4, including Figure 5.22, are set out in paragraphs 5.146 – 5.149 of the WHSAP, together with the associated Proposed Changes (PC107 – PC110 and Annex H). This appropriately includes reference to a Heritage Impact Assessment to guide development, development taking place within a strong landscape framework and contributions to help fund additional local school capacity. Additional funding may also be sought to increase capacity at local GP surgeries in the City. The site boundary shown in Figure 5.22 is proposed to be amended through PC108 and Annex H and takes into consideration comments from the Landowner through the Pre-submission consultation.
24. All parties agree with Proposed Change PC32, which changes the number of allocated dwellings to “Approximate number of dwellings” to provide flexibility and is consistent with paragraph 5.146 that requires “approximately 100 dwellings”. The number of dwellings is a matter of disagreement between the two parties and is addressed later in this statement. The parties agree that the above requirements are relevant to Land at Rowbarrow and provide sufficient clarity to guide the development of site allocation H3.4.
25. Initial studies have already been undertaken by the Landowner and more recently Bellway to consider the suitability of the site for development and to ensure that efficient progress can be made on a planning application following adoption of the Plan. Further detailed technical work as necessary will also follow at the planning application stage in line with pre-application discussions with the Council.
26. As set out above, the parties agree that Land at Rowbarrow is an appropriate site to be allocated for residential development of approximately 100 dwellings. However, the number of dwellings is a matter of disagreement between the two parties and is addressed later in this statement).

Delivery

27. The site is relatively unconstrained, and Bellway have a signed Option to develop with the land owners. Bellway have already committed to architects’ drawings and consultants’ background reports. Bellway are timetabling the submission of a planning application following the receipt of the Inspector’s report on the Examination in 3rd quarter 2019 and believe they can deliver 100/115 dwellings by the end of 2023 based on the following trajectory:

Year	WHSAP H3.4 allocation for 100 dwellings	Bellway proposal for H3.4 for change to 115 dwellings
2021	25	30
2022	45	50
2023	30	35

3. Matters of Disagreement

28. During the consultation on Focussed Changes to the Plan (11 December 2018 – 22 January 2019) Bellway submitted the following representation:

“Bellway Homes support the principal aim of policy H3.4 to allocate the land at Rowbarrow for residential development but object to the reference to approximately 100 dwellings.

Bellway Homes has been looking carefully at the housing capacity of this site, whilst recognising its planning constraints. Architects are currently preparing a more accurate layout plan, compared to the original illustrative masterplan submitted. This will demonstrate that more than a hundred dwellings can be accommodated. This is not quite ready but will be sent to the Council as soon as possible, for onward transmission to the Inspector

Bellway Homes would therefore like to see an amendment to Policy H3.4 so it reads approximately 115 dwellings, and focused change reference PC107, so paragraph 5.146 reads:

“Land at Rowbarrow is allocated for the development of approximately 115 dwellings on 5.56 ha of land as shown on the Policies Map”

Without a higher number of dwellings Bellway Homes do not consider the Plan accords with paragraph 15 of the National Planning Policy Framework March 2012 - Making effective use of land and Achieving appropriate densities”

29. A layout plan has been prepared by Bellway and submitted to the Council in February 2019. This shows a layout plan of 115 dwellings and is provided at Appendix x. Accompanying this layout updated reports were submitted in relation to Transport, Landscape Impact and Heritage Impact.
30. Bellway would want the Inspector to change the wording of Policy H3 to read:

Land is allocated for residential development at the following sites, as shown on the policies map:

Table 5.4 South Wiltshire Housing Market Area

Community Area	Reference	Site Name	No of dwellings
Salisbury	H3.4	Land at Rowbarrow	115

Signed:

Georgina Clampitt-Dix, Planning Policy Manager
Wiltshire Council

Date: 28 March 2019

Cliff Lane

Savills on behalf of Bellway Homes Limited Wessex

Date: 27 March 2019