

AGENDA

Meeting: Strategic Planning Committee
Place: Council Chamber - County Hall, Trowbridge BA14 8JN
Date: Wednesday 31 January 2018
Time: 10.30 am

Please direct any enquiries on this Agenda to Kieran Elliott, of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 718504 or email committee@wiltshire.gov.uk

Press enquiries to Communications on direct lines (01225) 713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at www.wiltshire.gov.uk

Membership:

Cllr Fleur de Rhé-Philippe (Chairman)	Cllr David Jenkins
Cllr Derek Brown OBE (Vice-Chairman)	Cllr Christopher Newbury
Cllr Clare Cape	Cllr James Sheppard
Cllr Ernie Clark	Cllr Tony Trotman
Cllr Andrew Davis	Cllr Fred Westmoreland
Cllr Stewart Dobson	

Substitutes:

Cllr Ian Blair-Pilling	Cllr Ruth Hopkinson
Cllr Matthew Dean	Cllr Chris Hurst
Cllr Christopher Devine	Cllr Nick Murry
Cllr Sarah Gibson	Cllr Stewart Palmen
Cllr David Halik	Cllr Graham Wright
Cllr Russell Hawker	

Recording and Broadcasting Information

Wiltshire Council may record this meeting for live and/or subsequent broadcast on the Council's website at <http://www.wiltshire.public-i.tv>. At the start of the meeting, the Chairman will confirm if all or part of the meeting is being recorded. The images and sound recordings may also be used for training purposes within the Council.

By entering the meeting room you are consenting to being recorded and to the use of those images and recordings for broadcasting and/or training purposes.

The meeting may also be recorded by the press or members of the public.

Any person or organisation choosing to film, record or broadcast any meeting of the Council, its Cabinet or committees is responsible for any claims or other liability resulting from them so doing and by choosing to film, record or broadcast proceedings they accept that they are required to indemnify the Council, its members and officers in relation to any such claims or liabilities.

Details of the Council's Guidance on the Recording and Webcasting of Meetings is available on request.

Parking

To find car parks by area follow [this link](#). The three Wiltshire Council Hubs where most meetings will be held are as follows:

County Hall, Trowbridge
Bourne Hill, Salisbury
Monkton Park, Chippenham

County Hall and Monkton Park have some limited visitor parking. Please note for meetings at County Hall you will need to log your car's registration details upon your arrival in reception using the tablet provided. If you may be attending a meeting for more than 2 hours, please provide your registration details to the Democratic Services Officer, who will arrange for your stay to be extended.

Public Participation

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

For extended details on meeting procedure, submission and scope of questions and other matters, please consult [Part 4 of the council's constitution](#).

The full constitution can be found at [this link](#).

For assistance on these and other matters please contact the officer named above for details

AGENDA

Part I

Items to be considered when the meeting is open to the public

1 **Apologies**

To receive any apologies or substitutions for the meeting.

2 **Minutes of the Previous Meeting** (*Pages 5 - 10*)

To approve and sign as a correct record the minutes of the meeting held on 6 December 2017.

3 **Declarations of Interest**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee.

4 **Chairman's Announcements**

To receive any announcements through the Chair.

5 **Public Participation**

The Council welcomes contributions from members of the public.

Statements

Members of the public who wish to speak either in favour or against an application or any other item on this agenda are asked to register by phone, email or in person no later than 10.20am on the day of the meeting.

The rules on public participation in respect of planning applications are detailed in the Council's Planning Code of Good Practice. The Chairman will allow up to 3 speakers in favour and up to 3 speakers against an application and up to 3 speakers on any other item on this agenda. Each speaker will be given up to 3 minutes and invited to speak immediately prior to the item being considered.

Members of the public will have had the opportunity to make representations on the planning applications and to contact and lobby their local member and any other members of the planning committee prior to the meeting. Lobbying once the debate has started at the meeting is not permitted, including the circulation of new information, written or photographic which have not been verified by planning officers.

Questions

To receive any questions from members of the public or members of the Council received in accordance with the constitution which excludes, in particular, questions on non-determined planning applications.

Those wishing to ask questions are required to give notice of any such questions in writing to the officer named on the front of this agenda no later than

5pm on **24 January 2018** in order to be guaranteed of a written response. In order to receive a verbal response questions must be submitted no later than 5pm on **26 January 2018**. Please contact the officer named on the front of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Committee members prior to the meeting and made available at the meeting and on the Council's website.

6 **Planning Appeals and Updates** (*Pages 11 - 14*)

To receive details of completed and pending appeals, and any other updates as appropriate.

7 **Planning Applications**

To consider and determine the following planning applications.

7a **15/04004/OUT: Old Sarum Airfield Limited, Lancaster Road , Old Sarum, Salisbury, Wiltshire, SP4 6DZ** (*Pages 15 - 80*)

Outline application with all matters reserved, except from the means of access to the site for the demolition, modification and renovation of existing buildings, structures and site development. Provision of approximately 18.6ha (gross) of residential land accommodating approximately 462 residential dwellings. Provision for a mixture of employment, commercial/leisure, and aviation uses on 3.1ha of land at Area B, including a "flying hub" comprising a control tower, heritage centre, visitor centre, café/restaurant, parachute centre, aviation archives and aircraft hangars. Provision of associated access, including the construction of new points of vehicles access to the surrounding highways network, car parking and connections to the surrounding footpath and cycle networks. Green infrastructure provision, including open space, play space, recreational footpaths, cycle paths and landscape enhancement areas; the provision of above and below ground utilities, including a sustainable urban drainage system. Associated vegetation removal, ground modification and engineering works.

7b **17/09248/VAR: Land East of Spa Road, Melksham, Wiltshire** (*Pages 81 - 98*)

Variation of Condition 32 of 14/10461/OUT relating to site access

8 **Urgent Items**

Any other items of business, which in the opinion of the Chairman, should be taken as a matter of urgency.

Part II

Item during whose consideration it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed

STRATEGIC PLANNING COMMITTEE

MINUTES OF THE STRATEGIC PLANNING COMMITTEE MEETING HELD ON 6 DECEMBER 2017 AT COUNCIL CHAMBER - COUNTY HALL, TROWBRIDGE BA14 8JN.

Present:

Cllr Fleur de Rhé-Philippe (Chairman), Cllr Derek Brown OBE (Vice-Chairman), Cllr Clare Cape, Cllr Ernie Clark, Cllr Andrew Davis, Cllr David Jenkins, Cllr James Sheppard, Cllr Tony Trotman, Cllr Fred Westmoreland, Cllr Ian Blair-Pilling (Substitute) and Cllr David Halik (Substitute)

Also Present:

Cllr Jonathon Seed

68 Apologies

Apologies for absence were received from:-

Cllr Stewart Dobson, who was substituted by Cllr Ian Blair-Pilling
Cllr Christopher Newbury, who was substituted by Cllr David Halik

69 Minutes of the Previous Meeting

Resolved:

To confirm and sign as a correct record the minutes of the previous meeting held on 11 October 2017.

70 Declarations of Interest

There were no declarations of interest made at the meeting.

71 Chairman's Announcements

There were no Chairman's announcements.

72 Public Participation

The rules of public participation were noted.

73 **Planning Appeals and Updates**

An update on planning appeals and decisions was received.

Resolved:

To note the update.

74 **17/08217/FUL - Land at A361, Blossom Hill, Trowbridge Road, Seend - Change of use of land with associated ancillary development to single traveller pitch**

Public Participation

Ms Liz Simes, a local resident, spoke against the application.

Mr Mark Wood, a local resident, spoke against the application

Mr David Pearce, a planning consultant, spoke against the application

Mr Tony Phillips, the applicant's planning agent, spoke in support of the application

Cllr Tony Murch, Chairman of Seend Parish Council, spoken against the application

The Committee received a presentation from the Case Officer which set out the issues in respect of the application, with a recommendation to grant planning permission subject to conditions.

Members then had the opportunity to ask technical questions after which they heard statements from members of the public as detailed above, expressing their views regarding the planning application.

Members then heard the views of Cllr Jonathon Seed, the local Member, who stated that he was concerned that the proposed development would have an adverse impact on the character and appearance of a very sensitive area of countryside which separated Seend and Seend Cleeve. As such he considered that the proposed development would conflict with Paragraph 109 of Chapter 11 'conserving and Enhancing the Natural Environment' of the National Planning Policy Framework, Paragraph 24 of the Planning Policy for Traveller Sites and also Core Policy 47 'Meeting the Needs of Gypsies and Travellers', Core Policy 51 'Landscape' and Core Policy 57 'Ensuring High Quality Design' of the adopted Wiltshire Core Strategy. Furthermore, Cllr Seend also considered that the proposal would result in an increase in traffic turning movements on a fast section of Road A361.

During discussion, Members expressed sympathy with the views of the local community but were informed by the planning officers that although it could be demonstrated that permission had been granted up to the recommended quota of pitches in Wiltshire, national policy stated that these quotas were to be regarded only as a minimum.

Members also noted that the application site was a reasonable distance from other dwellings and would be well screened from view. Regarding highway safety, it was noted that the Highway Authority had not raised any objections. The entrance to the site was situated on an open section of Road A361 and there were good visibility splays. There was also a metalled footpath along this road to the village of Seend.

Members stressed the need for the applicant to arrange for utilities to be connected to the site and noted that this was in hand and was also conditioned.

On the proposal of Cllr Tony Trotman, which was seconded by Cllr David Halik,

Resolved:

To grant planning permission, subject to the following conditions:-

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.**

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:**

-

Drawing no.TP1 RevA, Location Plan, received 27.10.17;

-

Drawing no.TP2 RevA, Block Plan, received 27.10.17;

-

Drawing no.TP3, Site linesDay room details, received 08.09.17;

-

Drawing no.TP4, Block Plan, received 06.11.17.

REASON: For the avoidance of doubt and in the interests of proper planning.

- 3 The site shall not be permanently occupied by persons other than gypsies and travellers as defined in Annex 1 of Planning Policy for Traveller Sites (DCLG, 2015).**

REASON: The site is in an area where residential development other than accommodation for gypsies and travellers would not normally be permitted therefore the permission must be restricted to gypsies and travellers only.

- 4 No more than 2 caravans, of which no more than 1 shall be a static caravan, as defined in the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968, shall be stationed on the site at any time.**

REASON: In order to define the terms of this permission.

- 5 No vehicle over 3.5 tonnes shall be stationed, parked or stored on this site.**

REASON:

In order to define the terms of this permission and protect the rural scene and character of the countryside.

- 6 No commercial activities shall take place on the land, including the storage of materials.**

REASON:

In order to define the terms of this permission, protect the rural scene and character of the countryside, and protect the amenities of the area and neighbour uses.

- 7 The development hereby permitted shall not be first occupied until an access measuring 4.5m in width for the first 5m with radii curves of 3m, with gates set back at 4.5m (opening inwards), surfaced in a consolidated material (not loose stone or gravel) for the first 5m has been laid out. The access shall be maintained as such thereafter.**

REASON: In the interests of highway safety.

- 8 No part of the development shall be occupied until visibility splays have been provided between the edge of the carriageway and a line extending from a point 2.4 metres back from the edge of the carriageway, measured along the centre line of the access, to the points on the edge of the carriageway 215 metres to the south west and 215 metres to the north east from the centre of the access in accordance with the approved plans. Such splays shall thereafter be permanently maintained free from obstruction to vision above a height of 900mm above the level of the adjacent carriageway.**

REASON: In the interests of highway safety.

- 9 No part of the development hereby permitted shall be occupied until the turning area and parking spaces have been completed in accordance with the details shown on the approved plans. The areas shall be maintained for those purposes at all times thereafter.**

REASON: In the interests of highway safety.

- 10** No development shall commence on site until a scheme for the discharge of foul and surface water from the site (including surface water from the access), incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be first occupied until the foul and surface water drainage schemes have been constructed in accordance with the approved scheme.

REASON:

The application contained insufficient information to enable this matter to be considered prior to granting planning permission. The matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure that the development can be adequately drained.

75 **Date of Next Meeting**

Resolved:

To note that the next meeting of the Committee was scheduled to be held on Wednesday 3 January 2018, starting at 10.30am, in the Council Chamber at County Hall, Trowbridge.

76 **Urgent Items**

There were no urgent items of business.

(Duration of meeting: 10.30 - 11.40 am)

The Officer who has produced these minutes is Roger Bishton of Democratic Services, direct line 01225 713035, e-mail roger.bishton@wiltshire.gov.uk

Press enquiries to Communications, direct line (01225) 713114/713115

This page is intentionally left blank

Wiltshire Council

Strategic Planning Committee

31 January 2018

Planning Appeals Received between 24/11/2017 and 19/01/2018 relating to Decisions made at Strategic Committee

Application No	Site Location	Parish	Proposal	DEL or COMM	Appeal Type	Officer Recommend	Appeal Start Date	Overturn at Cttee
14/08060/OUT	Land at Marsh Farm Coped Hall Royal Wootton Bassett Swindon, Wiltshire SN4 8ER	LYDIARD TREGOZ	Mixed Development of up to 320 Dwellings, Community Hub Comprising of 500sqm of A1/A2/A3/A4/A5/D1 &D2 Uses, Public Open Space, Landscaping, Extension to Approved Sports Hub & Access	SPC	Inquiry	Refuse	20/12/2017	No

There are no Planning Appeals Decided between 24/11/2017 and 19/01/2018 relating to Decisions made at Strategic Committee

The legal duty to state the reasons for making decisions on planning applications

A recent Court case (Dover District Council v CPRE Kent – December 2017) has set out more clearly the need for Councils to give reasons for their decisions when making planning decisions. Whilst this has been well known in relation to refusals of planning permission, the judgment adds more clarity as to what is required when decisions are taken to approve applications, and particularly when the decision is to approve an application against officer recommendation. This note looks at the implications of that court decision.

1. Refusal of applications and the addition of conditions

It has long been the case that local planning authorities must give reasons for refusing permission or imposing conditions. This is because there is a statutory right of appeal against the refusal or the imposition of conditions. Article 35(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 states that the authority in their decision notice must 'state clearly and precisely their full reasons'.

Members will be aware that in both delegated and committee reports, reasons for refusal are clearly set out by officers, and where members wish to refuse an application against officer recommendation, officers will prompt them for 'clear and precise' planning reasons. There is nothing new in this aspect. Members will also be aware that when officers are issuing delegated approvals, or recommending applications to committee for approval, the reasons for any conditions to be attached are identified in the decision notice or committee report.

2. Approval of planning applications

In relation to delegated decisions, there is a duty to produce a written record of the decision 'along with the reasons for that decision' and 'details of alternative options, if any, considered or rejected' (regulation 7, Openness of Local Government Bodies Regulations 2014). The Council complies with this requirement in relation to planning applications by issuing a decision notice and preparing a separate delegated report. Both of these are then uploaded to the Council's web site so that any interested person can discover both the decision on the application and the reasons that the decision has been made. The judgment re-affirms that what is required is an adequate explanation of the ultimate decision.

In relation to committee decisions, where an application is recommended for approval by officers, the judgment makes it clear that if the recommendation is accepted by members, no further reasons are normally needed, as the Planning Officer's Report will set out the relevant background material and policies before making a reasoned conclusion and it will be clear what has been decided and why.

The Judgment breaks new ground by providing greater clarity on what is required in the circumstances where members of a planning committee choose to grant planning permission when this has not been the course recommended by officers in the Planning Officers Report.

In short, the Judgment makes it clear that there is a principle of 'fairness' that needs to be applied, so that those who may be opposed to the decision can understand the planning reasons why members have arrived at their decision. There is no question that members are of course entitled to depart from their officers recommendation for good reasons, but the judgment makes clear that these reasons need to be 'capable of articulation and open to public scrutiny'. The Judgment cites an extract from 'The Lawyers in Local Government Model Council Planning Code and Protocol (2013 update) as giving the following 'useful advice':

'Do make sure if you are proposing, seconding or supporting a decision contrary to officer recommendations or the development plan that you clearly identify and understand the planning reasons leading to this conclusion/decision. These reasons must be given prior to the vote and recorded. Be aware that you may have to justify the resulting decision by giving evidence in the event of any challenge'

A further paragraph of the Code is cited that offers the following advice:

'Do come to your decision only after due consideration of all the information reasonably required upon which to base a decision. If you feel there is insufficient time to digest new information or that there is simply insufficient information before you, request that further information. If necessary, defer or refuse'

The underlying purpose of the judgment is to ensure that members can demonstrate that when granting permission they have properly understood the key issues and reached a rational conclusion on them on relevant planning grounds. The Judgment notes that this is particularly important in circumstances where they are doing so in the face of substantial public opposition and against the advice of officers for projects involving major departures from the development plan or other policies of recognised importance. This enables those opposing the decision to understand how members have arrived at their decision.

3. Practical Implications of the Judgment

The judgment re-affirms that the Council's existing practices and procedures are suitable to meet the legal duties imposed on it in relation to decision making on planning applications. The two key points are that where significant new information is provided shortly before a decision is due to be made, it is appropriate for members to ask for it to be explained, or if they consider that more time is required for themselves or officers to assess and understand it, to consider deferring a decision to provide suitable time. Secondly, when approving applications against officer recommendation, particularly those that are in sensitive areas or are controversial, the reasons why members consider that the harm identified can either be suitably mitigated or the reasons why a departure from policy is justified must be explained and recorded to demonstrate to those opposing the development how the Council has reached a rational conclusion. Members need to engage with the recommendations of the officer and explain the reasons for departure from those recommendations. If no rational explanation on planning grounds is recorded, any such decision could be at risk of challenge in the Courts.

Mike Wilmott - Head of Development Management

This page is intentionally left blank

REPORT FOR STRATEGIC PLANNING COMMITTEE

Report No.

Date of Meeting	31/01/2018
Application Number	15/04004/OUT
Site Address	Old Sarum Airfield Limited, Lancaster Road, Old Sarum, Salisbury Wiltshire SP4 6DZ
Proposal	Outline application with all matters reserved, except from the means of access to the site for the demolition, modification and renovation of existing buildings, structures and site development. Provision of approximately 18.6ha (gross) of residential land accommodating approximately 462 residential dwellings. Provision for a mixture of employment, commercial/leisure, and aviation uses on 3.1ha of land at Area B, including a “flying hub” comprising a control tower, heritage centre, visitor centre, café/restaurant, parachute centre, aviation archives and aircraft hangars. Provision of associated access, including the construction of new points of vehicles access to the surrounding highways network, car parking and connections to the surrounding footpath and cycle networks. Green infrastructure provision, including open space, play space, recreational footpaths, cycle paths and landscape enhancement areas; the provision of above and below ground utilities, including a sustainable urban drainage system. Associated vegetation removal, ground modification and engineering works
Applicant	Mr Grenville Hodge
Town/Parish Council	LAVERSTOCK
Ward	LAVERSTOCK, FORD AND OLD SARUM
Grid Ref	415237 133537
Type of application	Outline Planning
Case Officer	Richard Hughes

Reason for the application being considered by Committee

Following a protected period of discussions and negotiations, the applicant has chosen to exercise their right to appeal against non-determination of the application. This means that the Council no longer has the powers to formally determine the application, as this power now rests with the Planning Inspectorate. The matter is scheduled to be considered at a Public Inquiry later in the year. The views of the committee on the application are now sought to enable the Council to make its case to the Inspector.

1. Purpose of Report

As the applicants have appealed against the non-determination of the application, this report is intended to outline to Members the issues and outstanding matters surrounding the application, and to seek Members views on how they would have determined the application if they had retained the powers to do so. The report below outlines the issues and reasons for refusal officers consider form the basis for a defence of the appeal. Following Members consideration of this report, and depending on the outcome, officers will then defend the Council's position at the appeal.

2. Report Summary

1. Principle and Policy issues
2. Design and impact on surrounding area/heritage assets
3. Impact on residential amenity
4. Impact on highway systems
5. Impact on ecology
6. Archaeology issues
7. Drainage and flooding issues
8. S106 and viability matters

Laverstock and Ford Parish - Objects as the proposal does not accord with policy, lack of community involvement, no regard to the Conservation Area.

Salisbury City Council – Object due to the impact of the scheme on the Conservation Area, Air Quality, and highways matters.

Winterbourne Parish Council – Object to the application with reasons being congestion, perceived destruction of wildlife, inadequate infrastructure in the locality.

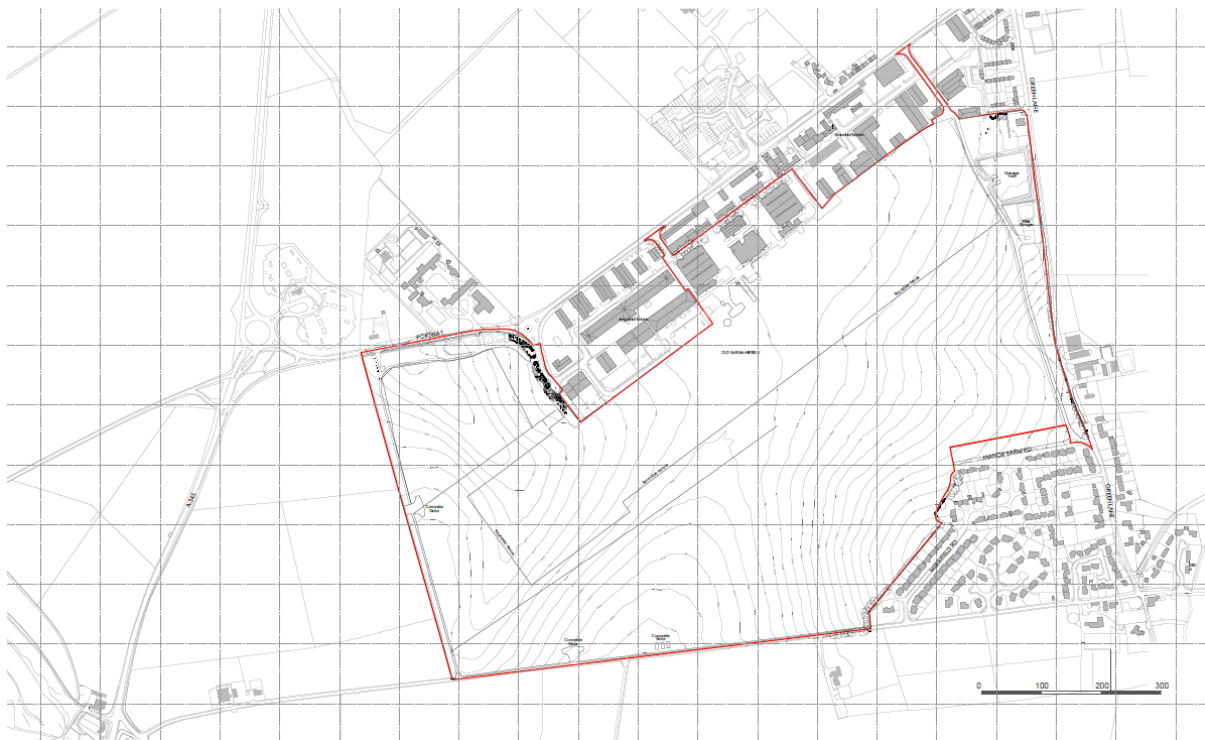
Third parties - 452 letters have been received, raising various concerns and issues, regarding the impact of the development on the surrounding area and the airfield itself (see later section of report). A petition with 1500 names and comments has also been received.

3. Site Description

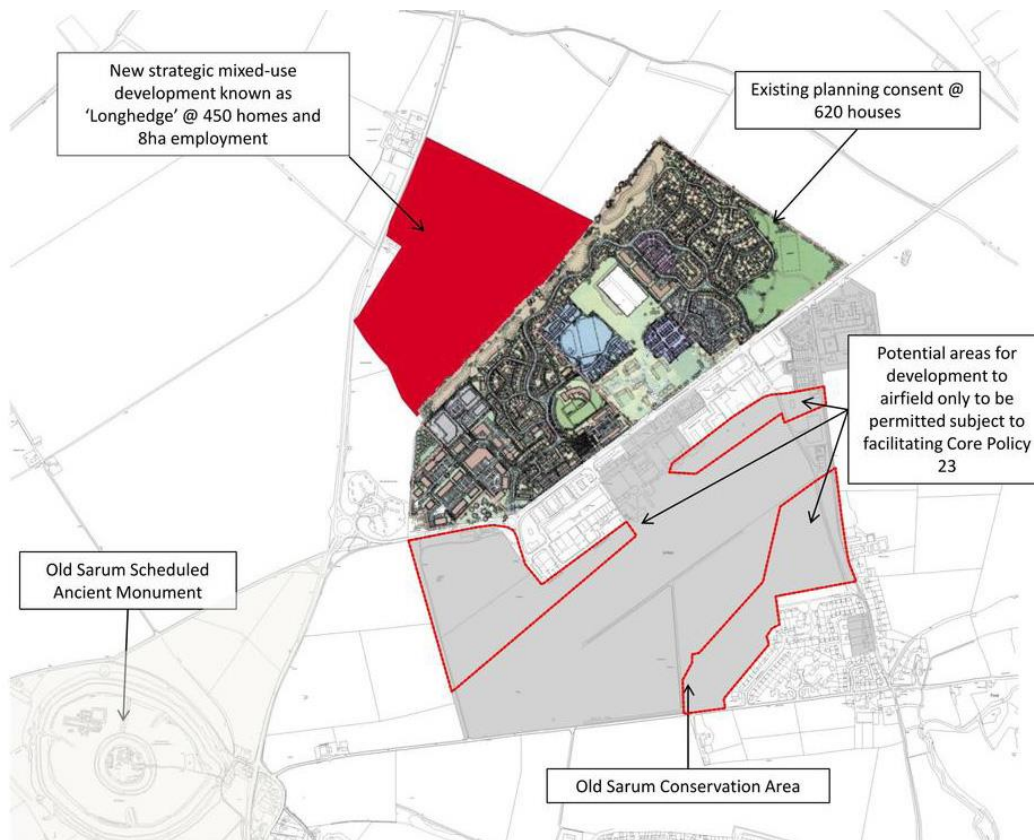
The site is located to the north of Salisbury and is located wholly within Laverstock and Ford ward. It is positioned between The Portway A338 Road (running along the north western boundary of the site) from which the airfield and other commercial uses are accessed, and the "C class" Roman Road, which bounds the site to the south.

The application site encompasses Old Sarum Airfield and associated airfield buildings and hangers, and also a disused squash court building, and a rifle firing range, which remains in use. The three hangars are Grade II listed buildings, and the whole airfield site is located within a Conservation Area. The majority of the site contains open grassland. A grass airstrip is located in the centre of the site. The airfield dates originally from World War 1 and was operated by the Ministry of Defence until the early 1980's, when it became a commercial/civilian airfield.

Some of the buildings within the red line of the application site and immediately adjacent to the airfield operated buildings are more modern commercial uses and industrial buildings, not associated with the operation of the airfield (known as Sarum Business Park).



The location of the site



Site Context

To the north east of the site runs Green Lane, a restricted Byway. To the north and north west are a number of commercial and industrial buildings, and beyond a growing area of housing (Old Sarum and Longhedge). To the south-west is located the Old Sarum Ancient Monument and its associated Conservation Area, and to the immediate south east, the site is bounded by the settlement of Ford, and Roman Road. Beyond that to the south is the growing area of housing known as Hampton Park and its associated Country Park.

4. Planning History

The site has been the subject of numerous planning applications/works including a number of mobile and small scale buildings and different uses since the early 1980's. For brevity only the most pertinent and relevant have been listed below:

- S/2004/0243 Certificate of lawful use - Use of land & buildings as an airfield for light aircraft storage, repair maintenance & refuelling, together with ancillary offices & restaurants
- S/1981/1043 Change of use of airfield to light industrial use and civilian airfield

Notwithstanding the various applications at the airfield, the land surrounding the airfield has been the subject of significant development in recent years, and in particular the following:

- 16/00048/FUL Revised Country Park design, at land adjacent to Hampton Park, Salisbury
S/2009/1943 500 Dwellings and new Country Park, Hampton Park, Salisbury
- S/2005/0211 Outline consent for housing, commercial, local centre, retail and community uses at Old Sarum, the Portway (followed by various reserved matters and applications for additional housing)
- 13/00673 Outline consent for 673 dwellings, commercial uses, local centre and community facilities, at Longhedge, adjacent Old Sarum (reserved matters app no. 15/07253/REM)

Other applications of interest

- S/2011/0437 Change of use to Aviation Museum
- S/2008/0670 Erection of stone memorial near Hangar 3
- 13/01292/FUL Change of use from B1/B8 to D1 museum
- 16/02069/FUL Replace squash courts with studio, demolish unused squash courts and construction of new gym/studio

5. The Proposal

The current application is in outline form only, with only access details provided in detail. Other matters such as design, scale and layout and landscape are therefore indicative only and would need to be approved via a future reserved matters or other similar full application. The scheme is accompanied by an Environmental Statement, which covers multiple issues, as well as other separate supporting documents such as a Conservation Master Plan, a Development Masterplan, a Design Code document, a Transport Assessment as well other ancillary documents covering archaeology, ecology, noise and vibration, aircraft safety, and a business plan. These are referred to in the relevant sections of the following report.

The application site is divided into 3 distinct areas of development. Over the duration of the application process, the applicant has adjusted the scheme, and it now includes the following works:



5.1 Area A – On land to the north west of the airstrip and existing commercial buildings it is proposed to construct up to 302 dwellings, including two new access points of the adjacent Portway road system. This area also contains road access to the adjacent Area B. These works involve the removal of some existing planting including along the Portway, plus replacement landscaping.

5.2 Area B – This area is located directly to the south east of the existing hangers and other commercial buildings. It is proposed to construct 6 hanger buildings (the initial residential accommodation within these has now been deleted from the application). Furthermore, a new Aviation building would be constructed, which would include a replacement control tower, together with a replacement cafe and restaurant, and house a museum of flying, together with several meeting rooms and ancillary spaces. A building is also proposed for the use as an Archive of flying history. New planting is proposed between these buildings and existing commercial buildings, together with new access roads and associated parking.

5.3 Area C – It is proposed to erect up to 160 dwellings to the immediate north west of Ford settlement, between Green Lane and the Roman Road, with vehicular access off the Roman Road. This area would include new planting/landscaping, including along the southern boundary of the application site adjacent to the Roman Road. There are also suggested highways works.

Additionally, to facilitate the above developments, the existing grass airstrip would be relocated 50 metres to the south of its current alignment, and extended.

It is proposed to remove some existing structures which are regarded as “clutter” in front of the existing listed hangers, and to make general improvements to the site, including interpretation boards, and to allow public access to and through the site. One of the dilapidated listed Hangars would also be repaired.

These matters are examined in more detail in the sections below.

6. Relevant Planning Policy

For the purposes of this application, the following policies are considered most relevant:

6.1 National Planning Guidance

NPPF, NPPG

Central Government Aviation Policy Framework guidance 2013

Central Government General Aviation Strategy document 2015

Noise Policy Statement for England 2010

Section 66 of the Planning (Listed building and Conservation area) Act 1990 states that the local planning authority has a duty to pay special attention to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Planning (Listed building and Conservation area) Act 1990 states that the local planning authority has a duty to pay special attention to the desirability of preserving and enhancing the character or appearance of the conservation area.

6.2 Wiltshire Core strategy policies

CP1 & CP2 – Settlement strategy and housing provision

CP3 – Infrastructure requirements

CP20 – Spatial Strategy for Salisbury Community Area

CP23 – Spatial Strategy South Wiltshire Community Area

CP25 - Old Sarum Airfield

CP38 & 39 – Leisure and tourism

CP43 – Affordable Housing

CP49 – Provision of local facilities

CP50, 51, 52 – Landscape, Green infrastructure and ecology

CP55 – Air Quality

CP56 – Contaminated Land

CP57 – Design and amenity

CP58 – Conservation of the historic environment

CP61 to 64 - Transport and Development

CP67 – Flood Risk

CP69 – River Avon SAC

Saved policies D8 (public art), R2 (open space)

Adopted Supplementary Planning Guidance “Creating Places”

Salisbury City Conservation Area Appraisal adopted 2014

Policy WCS 6 of the Wiltshire Council Waste Core Strategy

Wiltshire Council Air Quality DPD

7. Consultation response (summaries)

Wiltshire Council Conservation – Object due to the significant harm caused by the scheme on the heritage assets

Wiltshire Council Spatial Planning - Core Policy 25 is explicit in what new development needs to be assessed against, including the production of a Master Plan developed in partnership with various key stakeholders. Officers need to be satisfied that the application and its supporting evidence complies with the policy.

Wiltshire Council Environmental Protection – Object to the scheme on noise grounds (see amenity section of report)

Wiltshire Council Highways - Area A & B acceptable, subject to suitable contributions to sustainable transport initiative, but object to Area C in terms of its proposed access onto Roman Road and the subsequent impact of traffic onto this narrow road, which will also impact on pedestrian and cycle safety.

Wiltshire Council Open space - Object, until additional financial contributions required for impacts of dwellings on play space and equipment provision are provided via a S106.

Wiltshire Council Housing – Object, until 40 percent affordable housing provided in line with Policy CP43, unless viability assessment indicates that a lesser provision is required.

Wiltshire Council Education – Objection until financial contributions for primary and secondary provision, and early years provision have been secured via a S106

Wiltshire Council archaeology - No objections subject to suitable mitigation and management, and a suitable condition.

Wiltshire Council Waste and Recycling - No objections subject to waste and recycling contributions in line with policy as part of a legal agreement.

Wiltshire Council Public Art officer – Object unless a financial Contribution towards public art is provided

Wiltshire Council Urban Design – Object due to poor design and layout issues

Wiltshire Council Drainage – Conditions required to secure suitable foul and surface water drainage

Wiltshire Police (Design Advisor) – Object to the proposed layout as it shows a lack of defensible space, poor parking arrangements distant from the dwelling, restricted surveillance, and excessive permeability, contrary to national and local policies.

Wiltshire Fire and Rescue. - Contribution required towards fire and rescue infrastructure, plus general advice provided.

Historic England - Historic England objects to this scheme, in its current form, as we are unconvinced that this proposal will allow for a sympathetic and compatible new development on the airfield's perimeter that can deliver a sustainable future for the listed hangars, and will

not cause major damage to the setting of the nearby scheduled hillfort of Old Sarum, together with harming the character and appearance of the Old Sarum Airfield Conservation Area.

The Core Policy accepts some form of development at the airfield, within certain parameters (in addition to being compliant with national policy and guidance) and on the basis that it delivers certain benefits. We do not believe that the current proposals fully meet those policies or that it has been demonstrated that the possible harm to the historic environment has been minimised. We recognise the need for investment in the historic fabric on the site, and welcome the desire to provide a sustainable future for continued flying from the site.

Natural England - No objection either development options, satisfied that proposals will not adversely affect the integrity of the River Avon SAC, SSSI. Welcomes proposals for enhancement of biodiversity which should be conditioned. Recommends the planting scheme for the Community open space (option A) include elements to enhance the site for butterflies. Provision for nesting swifts is included in the scheme.

Environment Agency - No objection, subject to conditions related to land contamination, groundwater protection, surface water management and water efficiency

Wessex Water - Guidance provided regards drainage matters. Recommends that condition be imposed requesting a foul and surface water drainage strategy.

Highways England - No objections subject to a financial contribution towards improvements to traffic light system on Castle Road Roundabout and those works coming into operation prior to the development.

MoD – No safeguarding issues

CAA - The housing structures shown in the elevation plan do not present any hazard to civil aviation as en-route obstructions. However, check any safeguarding maps lodged with the Council to identify any aerodrome specific safeguarding issues. In all cases, responsibility for aerodrome safeguarding rests with the aerodrome operator/ licensee, not the CAA.

8.0 Third Parties/Publicity

Salisbury City Council Object for the following reasons (Summary):

Impact on Old Sarum Conservation Area

- The revisions to the planning application address some points which have been raised by consultees, for example a reduction in house numbers from 310 to 302 in Area A is proposed so key views between Old Sarum and the airfield can be retained. However this fails to address the significant concerns in respect of conservation, design and landscape issues which have been raised:
- Concerns have been expressed about restrictions on the flying activity at Old Sarum should the proposed housing development go ahead. This would be contrary to the provisions of Core Policy 23, which says development will only be permitted if it retains and safeguards flying activities from the airfield. There would be a concern, should flying be curtailed or cease altogether, that this would impact on other local industries and businesses. This would be contrary to Core Policy 20, where Old

Sarum is considered to be a Principal Employment Area which will be supported in accordance with Core Policy 35.

Green Travel Plan

- Area C of the development in particular is poorly served by public transport, and in the amended planning application there are no steps to address this.
- There are high levels of parking provided: the application form indicates 1403, which is 1253 spaces more than currently at the site (this will presumably have reduced marginally in the revised application). Research has shown that the more parking there is provided by a new development, the higher the household car ownership level. Furthermore developments with more parking produce more car travel since people who own cars use them.

Air Quality Issues

- The issue of traffic congestion on the A345 and the air quality issues which would result both on that corridor and elsewhere in Salisbury has not been satisfactorily addressed in the revised planning application.
- Significant additional traffic will be generated by this development in combination with other developments on this corridor which are already consented (at Old Sarum and Longhedge) so it seems inevitable that the delays and congestion which are already a problem on Castle Road will get worse when the traffic from this development is added.
- A 'sizeable impact' in traffic terms at this roundabout is going to lead to increased congestion on this roundabout, and there are no plans to install MOVA here. A worsening of the air quality in this part of the AQMA seems inevitable.

Laverstock and Ford Parish Council – Object for the following reasons:

- The plans for the airfield would lead to a massive overdevelopment for the northern part of the Laverstock and Ford Parish.
- The Parish Council understands and fully supports the aspiration to continue flying at Old Sarum Airfield. What is proposed within the Planning Application is overdevelopment in the extreme and ignores the views of the majority of the residents within the Parish.
- It will destroy the character of this historic asset and goes against the rationale for conferring Conservation Area status on a priceless WW1 flying field.
- The level of development proposed far exceeds that required to 'preserve and enhance' the Conservation Area and thereby the Airfield. There is almost no information provided on (1) the Capital Investment required for renovating/enhancing the airfield or (2) the income streams required to secure the long-term future of the site, which might convince the Parish Council to the contrary.

- Community involvement – issues with the process carried out by the applicant
- Impact on A345 and surrounding systems may not be addressed by the solutions put forward by highways england
- Local Roads and traffic – concern about impact on roman road and Green Lane, pedestrian accessibility and safety, as there is a history of accidents in the area
- Noise – aircraft and pistol range. Whilst encouraging to note that most of the housing will not be subject to excessive noise, it is not acceptable for the remainder of dwellings to exceed the recommended levels, and some dwellings should be removed from the plan.
- Density and magnitude – the development of Area A is too high a density and does not accord with the surrounding area. 462 houses is gross overdevelopment
- Viability – will the airfield be viable even if the proposed development goes ahead ?
- Infrastructure to support the size of development remains inadequate
- Draft Conservation Management Area Plan is not acceptable – an adopted CAMP must be in place before any new development can be permitted

Winterbourne PC - Object to the application with reasons being congestion, perceived destruction of wildlife, inadequate infrastructure in the locality.

Third Parties - The Council's record system indicates that a petition with 1500 names and comments has been submitted, and some 452 letters/correspondence (some from the same parties and regarding the amended plans), raising various concerns and issues regarding the impact of the development on the surrounding area and the airfield itself. The issues raised include:

- Sets precedent for further development north of Salisbury
- Results in over development/ over population
- Less sensitive alternative sites are available
- Unacceptable density proposed
- Site is not a strategic housing allocation
- No need for housing in the area
- Benefits will not outweigh harm
- Cumulative impacts of developments in area
- Housing mix inappropriate

- Airport would still be viable with fewer homes
- Noise complaints from new residents will lead to a cessation of flying
- Long term operation of the airport will be threatened
- Owner intends to develop the whole airfield
- Parachute school will cease
- Flights will be unable to operate safely in constrained area
- Stated intention to ensure flying for next 100 years not substantiated with evidence
- Reduced capacity to host special events
- Lack of costings information provided
- Alternative income/funding streams have not been considered
- Development of business park ignored
- Justification on the basis of viability not material to the application
- Enabling Development element of the proposal should meet Historic England advice
- Loss of employment
- No justification for how flying will be sustained provided
- New licence will be required when development is completed – details unknown
- Clear business case needs to be presented
- Voluntary reduction in flying activities by 40% as existing demonstrates agenda
- Noise, pollution and safety concerns will lead to closure
- Harmful to aviation heritage/ conservation area/ listed buildings
- Harmful to setting of Old Sarum SM
- Perimeter of airfield is valuable to its character and will be destroyed
- Timetable/ funding related to heritage improvements/ protection not provided
- Grass airfield should be preserved as it is a rare surviving example
- Archaeological finds have not been considered
- Urbanisation of Roman Road unacceptable
- PPG has altered since submission, so principle of allocation is affected
- Existing road infrastructure inadequate
- Highways improvements proposed insufficient
- Adverse impact on A345/ journeys to Salisbury
- Additional traffic in Ford unacceptable
- Safety and pollution concerns
- Congestion will lead to loss of tourism income
- Impact on Green Lane unacceptable
- Cumulative highways effects have not been considered
- Lack of alternatives to private car – unsustainable
- Car sharing should be encouraged
- Roads are prone to flooding in Ford
- Pedestrian routes are inappropriate
- Impact of delivery vehicle traffic
- Harm to views from Old Sarum Scheduled Ancient Monument
- Impact on views out of the airfield
- Destruction of semi-rural character of the Parish
- Coalescence
- Impact on views from the air
- Impact on distinctive landscape character
- Impact on views from top of Salisbury cathedral

- Loss of open space/ green fields/ countryside/ recreational space/ agricultural land
- Loss of strategic gap/ buffer
- Loss of green belt
- Urban sprawl
- Develop brownfield first
- Harm to wildlife/ ecology
- Loss of wildlife corridor
- Loss of unimproved grassland habitat
- Impact of Equinox noise and vibration
- Impact of flying – with risk of airport closing
- Impact of traffic
- Noise attenuation in proposed dwellings unacceptable
- Impact of construction
- Adequacy of noise survey
- Impact of shooting range and complaints leading to closure
- Restricting flying will enable the Council to control noise
- Uncertain that sufficient mitigation will be secured as part of any permission
- Impact on infrastructure
- Inadequate infrastructure improvements
- Need for affordable housing
- Lack of capacity in local schools
- No local employment
- Lack of health facilities
- Lack of shops
- Lack of public transport
- Impact on character/ identity of Ford
- Impact on Ford's infrastructure
- Will lead to coalescence of settlements
- Impact on light and privacy
- Reduction of safe land area, particularly relevant as airfield is used for training
- Safety concerns associated with additional traffic
- Reduction in size of parachutist drop zone
- Impact on potential for air displays due to encroachment of development
- Highways safety concerns
- Proximity of shooting range
- Inadequate engagement
- Views of community disregarded
- Too few neighbours consulted
- Developer's questionnaire was confusing
- Existing flooding not adequately considered
- Development will exacerbate flooding elsewhere
- Capacity of drainage network
- Roads prone to flooding
- Sewage Capacity and flooding/drainage issues in Ford and Green Lane
 - Proposal will not create significant employment
 - Impact on tourism
 - Submission of separate applications for each development parcel

- Adequacy of CAA response
- Consideration of MoD covenants
- Inconsistency in planning process and information submitted

The above responses contained the following comments from various groups:

Old Sarum Residents association - Objection (Summary)

- This housing will put significant pressure on a small area with very poor infrastructure
- The roads will be gridlocked and put pressure on Ford, which is already used as a rat run, and has no footways and is prone to flooding.
- Will exacerbate existing drainage and flooding issues
- The public consultation was not well done
- The proposed development is not sympathetic to the historic airfield and the character of the site will alter
- Will create a precedent for further development of the area
- Will residents of new houses be safe so close to the airfield runway

Salisbury Civic Society - strongly objects to the current proposal for the following reasons (summary):

- Impact on Conservation Area & setting of Old Sarum- The historic airfield would be squeezed to an unacceptable extent by this proposal & it would lose both its unique character & identity. Furthermore, the scale of development would have an adverse visual impact on views from Old Sarum, & into & out of the Conservation Area. In addition, there would be an adverse impact on the rural character of Green Lane to the north of Manor Farm Road & on the area to the west of the property known as 'Green Acres' on the Ford road.
- Layout & Design- majority of the development is very banal any-place suburban & is hardly appropriate here in this special historic environment. Residential hangars are shown along the existing development frontage. This approach would hide/screen the existing buildings & the distinctive 'clutter' of a working airfield & is not considered enhancement & would encroach onto the airfield itself & detract from the qualities of this historic site.
- Whilst the sketch elevations in this outline proposal includes some potentially interesting sketch designs for the living hangars where residents could park their own plane, the majority of the development proposals are again very banal suburban in style when there are clearly opportunities for a much more innovative approach
- Landscape & Planting- The proposed planting would offer some screening effect in due course & assist with integration; there is also an acknowledgement of the Roman road in the layout, but there appears to be nothing that marks it out as a special or

imaginative landscape solution that picks up on the open & spacious qualities of this unique landscape & the important views both out of & into the Conservation Area.

- Furthermore, there is no indication that any consideration has been given to identifying off site planting opportunities in order to overcome the issues of visual impact, impact on local amenities including noise, & impact on the historic character of the airfield itself in a way that is appropriate & will make a positive contribution to the character & quality of this area.
- Impact on Local Amenities- Rather than enhancing the historic environment & protecting the amenity of existing residents as required by the Core Strategy, spreading out the development in the way proposed means that future residents will be very dependent on their cars because it is harder to connect with existing service provision such as shops, schools & the Park & Ride facility. The scale of development would also have an unacceptable impact on the local road infrastructure in the area & on traffic & air quality particularly in Castle Road. There is a danger that the increase in housing close to the airfield could lead to an increase in noise & safety considerations which could lead to pressures for more restrictions on its use & ultimately the closure of the airfield.
- Other Points- It is important to find ways to ensure the windfall gain from any housing development is guaranteed to secure the future of the airfield, its historic hangars & appropriate enhancement of the Conservation Area.

CPRE (summary)

- *Purpose* - new facilities and benefits for the community - of the 13 listed there are only 3 that “might be” of some interest to the community:
 - Restaurant
 - Fast Food Café
 - Recreational walking and cycling routes
- Despite the primary purpose being the airfield, there appears above, and in other parts of the substantial documentation, ill-judged and ill-conceived attempts to persuade us that the aim is to produce an integrated airfield community with huge benefits to all and sundry, including the surrounding community (though this is ill-defined), and indeed the whole of Salisbury.
- *Heritage* - Placing a large housing development in very prominent places visible from the Scheduled Monument and from many other parts of the surrounding landscape could hardly be described as “screening”.
- *Access* - we have to express concern that developers seem frequently to insist that the introduction of large numbers of extra vehicles will have no or minimal impact on the road network.
- *Flooding* – although the application area itself is a low risk flood area, the valley in which sits the village of Ford frequently floods. The construction of 470 houses and associated facilities (roads, etc), no matter how carefully done will inevitably mean an increased danger of flooding in the Ford area. This is unacceptable

- *Business Plan* – there is no business plan for the airfield development and it is therefore difficult to see whether all the works proposed in Scheme B will eventually fulfil the purpose of extending the life and vitality of the airfield. This is unsound
- *Facilities* - Old Sarum has few facilities, apart from a school. With the current and consented growth for Old Sarum, the imposition of masses of extra housing should not be allowed until this lack is rectified.
- *Ford* – the building of 160 new houses right next to Ford begs the question as to whether they are part of Ford, to which they will be contiguous, or of Old Sarum from which they are somewhat distant. And this construction would also remove the green barrier between the village of Ford and the outlying suburbs of Salisbury, a separation which has been respected for many years. The 160 new houses would double the size of Ford and place a sudden and unacceptable burden on this community contrary to Core Strategy policies regarding the protection of communities
- *Employment* – the Core Strategy stresses in numerous places that employment and housing should be developed together.
- *Key principle* – There is no employment development proposed with this application. Indeed the number of employees currently working on the airfield site is deemed to remain the same. This is contrary to the Core Strategy
- *Other* – there are other variances from Core Policies in the Wiltshire Core Strategy as instanced by the Parish Council and serious allegations of a lack of full and proper community involvement also detailed by the Parish Council.
 - New application should have been submitted
 - This is three applications that should have been considered separately
 - Lack of community involvement
 - Changes to Area B have made this part less acceptable
 - Concerns about the future viability of the airfield

Salisbury Area Greenspace Partnership - Object (Summary)

Impact on Historic Airfield, Landscape Setting and Strategic Gap

- The amount of development proposed, particularly for Areas A and C would impinge on the historic airfield and Conservation Area to an unacceptable extent and jeopardize the distinctive character that is derived from the open and spacious qualities of the landscape and the stunning views both out of and into the Conservation Area.
- The proposed development, particularly for Area A, would have an adverse and intrusive impact on views from the Ancient Monument of Old Sarum and would also affect views into and out of the Airfield Conservation Area. Development on the scale proposed around the edges of the airfield would impinge on the integrity of the strategic gap and green buffer zone to an unacceptable extent.

Proposals for Mitigation

- Core Policy 25 requires a landscape-led approach to the development of this site and clearly states the need for high quality landscape improvement to mitigate the visual impacts.
- It is difficult to see what is 'high quality' about the landscape proposals being put forward. As they stand as they are not dissimilar to schemes in the existing housing areas at Old Sarum.
- The proposed planting would offer some screening effect in due course and assist with integration over time; there is also some acknowledgement of the Roman road in the layout, but there appears to be nothing that marks it out as a special or innovative landscape design solution.
- In addition, the requirement for the long-term pro-active enhancement of the Conservation Area as a whole is likely to include the identification of offsite opportunities to achieve improvements in the broader landscape as well as opportunities for enhancement within the site itself. Development of the high quality landscape improvement strategy required needs to be an integral part of the master planning process.

Absence of Master Plan

- Wiltshire Council's adopted Core Strategy specifically states in paragraph 5.121 that there will be a Master Plan which will be developed in partnership with the local community, the local planning authority and the developer prior to any application being considered. Salisbury Area Greenspace Partnership is not aware that any such Master Plan exists or that there is any forum or mechanism for the two community areas to work together to consider the bigger picture and contribute to developing the Master Plan for the airfield.

Council for British Archaeology (Summary)

Damage to setting of the hillfort

- Our primary concern lies in Area A where we consider that the impact upon the setting of the Old Sarum Hillfort ancient monument will be most adverse. In this case there are also significant damaging aspects to the developments proposed at site A and C which unbalance the ratio of benefits to harm. In particular area A would appear to us to be an unsuitable location for the siting of a residential development based upon the historic landscape impact which it would have.
- We are unsure how the plan justifies claims that the plan offers 'improvements to the setting of the Scheduled Monument' (Design Masterplan p.27) and would regard that, in actuality, the imposition of housing on this site would be a substantial detractor to the current setting of the monument.
- The current proposals, in our opinion, negatively affect the landscape character by hemming in wide, open connections, impact views from the monument, and detract from the visual dominance of the asset as a focal point in the landscape . We do not agree that the imposition of a large area of housing will 'soften impacts' of intrusive buildings
- Not only do we consider the proposed development at area A an encroachment on the current setting, we also consider that it is an inappropriate site for a residential development, owing to the lack of other residential development in the immediate

vicinity (with industrial and commercial uses associated with the surgery and airfield to the east of the Portway and housing only occurring on the north and west of the airfield, substantially further away from the hillfort and its wider continuous landscape). It is possible that Area A could be developed in a more appropriate way, for example, the siting of the heritage centre and restaurant at this western location would put it in a more suitable spot for attracting visitors to the hillfort, and vice-versa.

Impact upon the Old Sarum Airfield Conservation Area

- The proposed residential development in Area C is less damaging to the setting of the hillfort being situated at distance which is unlikely to lead to a significant difference in perception of the landscape. There are, however, impacts of the proposals on the airfield conservation area. The City of Salisbury Conservation Area appraisal does mention the importance of the views across open landscape to the hillfort and thus provide some evidence that this landscape quality is valued.

Impact on the historic buildings

- Whilst we consider the area B proposals to be largely appropriate if it secures the future of the site as an active airfield and enables greater tourist use of the site as a heritage attraction, we do note that it is important to recognise the impacts on the listed buildings.
- We note with respect the detailed application and the high quality information which is provided in the application in respect of the historic environment. We are encouraged by this, and hope that the applicants are therefore open to constructive comments on the nature of the development. We recognise the need to build housing, particularly where such development enables conservation of the historic environment. However, we are unconvinced in this case at the necessity of the extent, scale and siting of some of the planned housing.
- We note our appreciation for the intention to create a heritage centre on the site and to renovate the existing listed buildings. We also feel that the buried archaeology on site is well understood and that provided that appropriate conditions are added to any permission that there should be no objections raised on these grounds. These are all positive things. However, the impact of the proposals on the landscape quality are moderate to severe, particularly the proposals at site A, and we question whether the development potential for this area is one which is appropriate in its current form.

9.0 Planning Considerations

9.1 Principle, policy, and planning history

9.12 National Planning policy

National Planning Policy, via the NPPF, is supportive of economic regeneration projects and the provision of housing in sustainable locations. The NPPF indicates generally that:

“14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For decision-taking this means:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.”*

In terms of aerodromes and airports, Paragraph 33 of the NPPF generally covers the topic:

“33. When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.”

Other associated guidance is then provided in separate central government aviation related documents. However, the general thrust of this guidance assumes that the Local Planning Authority would either be dealing with development suggested by a third party which may impinge on the operation of an adjacent airfield, or that aviation related development is being proposed by an airfield operator itself. The 2013 Aviation Policy Framework document states that:

“..The Government’s primary objective is to achieve long-term economic growth. The aviation sector is a major contributor to the economy and we support its growth within a framework which maintains a balance between the benefits of aviation and its costs, particularly its contribution to climate change and noise. It is equally important that the aviation industry has confidence that the framework is sufficiently stable to underpin long-term planning and investment in aircraft and infrastructure.

This particular application is somewhat unique in that it relates to development proposals by an airfield operator, most of which is not connected to the actual operational requirements of the business (including the housing in Areas A & C).

9.13 Local planning policy

In general terms, CP1 & CP2 relate to sustainable development and housing provision. CP23 relates specifically to the strategy for the South Wiltshire Community Area, where the application site is located. The enhancement of the airfield leisure facilities would also be covered by policies CP38 & 39. CP 49 encourages the enhancement of community facilities.

A site specific policy was originally included in the previous adopted South Wiltshire Core Strategy (then Core Policy 9). This was then included within the adopted Wiltshire Core Strategy (WCS) as Core Policy 25 (previously policy number 23 in some earlier iterations of the document). The supporting text to this policy states that:

5.133 Old Sarum Airfield dates from the First World War and is one of the best preserved in the country as it has remaining technical buildings and three listed hangars, which still have a functional relationship to the grass airstrip. The facility is highly valued locally for the historical and recreational opportunities it provides. However, there are a number of issues relating to the site that this Core Strategy seeks to resolve.

5.134 The heritage value of the airfield has been damaged by the intrusion of functional late 20th century industrial sheds, which compromise its historic character. There are no controls over the level and intensity of flying activity from the airfield, and there has been a long history of complaints from local residents about the noise, which has been caused largely by aeroplanes flying over the city, in training circuits, especially during the summer months. While there is no local wish to prevent flying altogether, there is a desire to seek some control and strike an appropriate balance between the flying activity and amenity of Salisbury's residents.

5.135 This strategy will allow sympathetic new development on the airfield perimeter, including high quality residential use, where it can be fully demonstrated that it will deliver the outcomes identified in the following policy. The Master Plan will be developed in partnership with the local community, local planning authority and the developer prior to any application being considered.

The main text of the policy sets out the criteria that must be met if any new development at the airfield is to be permitted:

New development will only be permitted on Old Sarum Airfield if it delivers the following:

- i. A long-term proactive strategy for the enhancement of the Conservation Area including management plan and public access and visitor/interpretive material on its historic relevance**
- ii. A high quality strategic landscape improvement to mitigate impacts of existing intrusive buildings, to soften impacts when viewed both out and into the Conservation Area and from Old Sarum Scheduled Ancient Monument**
- iii. The completion of a legal agreement (section 106) to agree reasonable controls over flying activity in the interests of the amenity of local residents**
- iv. Submission, agreement and implementation of a development master plan, which delivers a high quality development that takes opportunities to enhance the historic environment and protects the amenity of existing residents**
- v. Retains and safeguards flying activity from the airfield**
- vi. Provides community benefit for the Old Sarum residents.**

Therefore, some form of development of this site is acceptable in principle, but only subject to the various criteria listed within the policy being met as well as the other relevant policies in the development plan, and compliance with the statutory duties applying to development and heritage assets, and national planning guidance. The following report outlines the scheme that has been submitted and whether the aims of policy and other national and local planning policies have been met.

However, in order to fully understand the reasoning behind Core Policy 25 (see below), it is necessary to understand some of the recent history related to the site that occurred up to the policy being formulated.

Old Sarum Airfield dates from the First World War and is one of the best preserved in the country, in that it has remaining technical buildings and three listed hangars which have an unsevered, functional relationship to the grass airstrip. The facility is highly valued locally for the history and recreational opportunities it provides. However the site has been affected for years by two issues.

Firstly, noise. Historically, there had been a history of noise complaints to the predecessor Council (Salisbury District) related to the operation of the airfield. Whilst the Council sought to take some form of enforcement action, operational airports and aerodromes are exempt from prosecution in regards to noise disturbance under the Environmental Protection Act. Furthermore, the original planning permission granted for the commercial airfield in 1981 did not contain any restrictive planning conditions on the operation of the airfield.

Secondly, heritage. The heritage value of the airfield (Grade II* listed hangars and a designated Conservation Area) has been affected by the introduction of later industrial buildings which compromises its historic character. Furthermore, the value of the heritage asset has been placed at risk by ongoing speculative developments, not least that of building on the whole of the site proposed through a previous local plan process. The Planning Authority has resisted these attempts, including through Local Public Inquiries.

In this respect the Inspector in his final report into the South Wiltshire Core Strategy concluded:

“...Another issue is that the hangars are surrounded on three sides by unsympathetic modern industrial buildings. These buildings are intrusive, they harm the character and appearance of the conservation area and, being clearly visible from the ramparts of the hill fort at Old Sarum, they harm the setting of this Ancient Monument.”

As a consequence, the Council began discussions with the owners of the airfield to try and resolve the noise complaints. The result of these discussions was that it was resolved that a legal agreement would be required from the airfield operator in order to place restrictions and limitations on the operation of the airfield that would reduce the noise disturbance issues and result in heritage improvements. In return, it was agreed that such an agreement would be secured as part of a Core Strategy policy, which would permit some form of limited development of the airfield in exchange.

9.14 How the three development areas were produced

The Council Spatial policy officers have indicated the areas highlighted for development in the Core Policy were developed as follows:

“.....Areas of the airfield were assessed, firstly, to ensure that regeneration would not prejudice the historic flying activity at the airfield or compromise the unsevered relationship between the listed hangars and the operational flying field, which is a unique feature as identified in the English Heritage study, 'Survey of Military Aviation Sites and Structures, Summary Report' by the Thematic Listing Programme, J. Lake 2000 (see evidence base document STU/49).

Secondly they were based on an assessment of the site to establish how the topography could be utilised to introduce carefully screened views both in and out of the site and across the airfield, thereby mitigating the impact of later commercial built interventions. The Old Sarum Conservation Area Appraisal is a detailed assessment of the airfield and its environs. This document clearly indicates where there have been instances of intrusion and damage to the special qualities of Old Sarum Airfield and outlines the potential for enhancement, through improved landscaping and restoration of items of original character, through removal of inappropriate fences and such like. This data was drawn on by the landowner who commissioned their own detailed contextual landscape and site appraisal to further inform discussions with the Council.

Based on such evidence it is the assessment of the Council, as set out in adopted policy, that a carefully designed development has the potential to have a positive effect on the airfield, listed buildings and Old Sarum Scheduled Ancient Monument, through the improved screening of inappropriate views allied to careful design and a comprehensive landscape scheme. Also some interpretative material and managed public access to the site would greatly add to the understanding and appreciation of the airfield and its role in British aviation history.

The South Wiltshire Core Strategy Final Sustainability Appraisal July 2009 Appendix IV, page 151-153 indicates a positive outcome for this policy subject to appropriate mitigation measures...”

9.15 Collaboration with landowner

The Spatial policy officers have also offered the following explanation of their involvement of the landowner in policy formulation:

“...The Council accepted that to achieve these aims then there needs to be an incentive for the landowner and hence Core Policy 25 states it will allow sympathetic new development on the airfield perimeter, including high quality residential use, where it can be unequivocally demonstrated that the above objectives can be delivered and that the historic flying function is preserved. To work in partnership with landowners to try and find a lasting solution to regeneration and safeguarding of heritage assets is standard practice and required by national policy. One of the key aspects is seeking a viable use, which makes necessary investment justifiable.

The Core Policy seeks to afford the Council some control over the level of flying activity and therefore the noise caused by it, for the first time. This would be by means of a voluntary, but enforceable, Section 106 Agreement that sets out the type and levels of flying activity that would be permitted. The background to this is important. The landowner has expressed a commitment to a Section 106 agreement which sets out the type and levels of flying that will be undertaken. This would allow the Council, for the first time, to have some control over the activities so that it can monitor and enforce if, for example, the activity intensifies in a manner that is outside the agreed parameters and leads to complaints. Therefore this would deliver one of the key outcomes sought by the then planning committee which looked at this issue in 2000...”

9.16 Core Strategy evidence.

The Council's Spatial planning officers have also offered the following regards formulation of the three areas of development referred to by the Policy.

The Core Policy is clear that the three indicative areas have the potential in principle, if sensitively developed, to bring significant benefits to the Airfield and wider environment, including mitigation of noise and softening harsh, urban edge views. As stated clearly in the Statement of Common Ground agreed with Blaneield Property Co at the Examination in Public:

Each area has different opportunities and constraints deriving from their location, adjacent uses and linkages influencing the types and forms of development most sensitive and appropriate to the location.

Definition of potential areas in Map 5 is indicative and does not necessarily mean that they will be fully or inappropriately developed:

- *in the north west area the original line of the Portway and the view cone to Old Sarum SM should be kept clear.*
- *Proposals will be subject to stringent site specific and normal development management policies including on noise pollution, listed buildings, conservation areas, landscape, protection of amenity, sustainability, access.*

So as with any planning application submitted in response to an adopted planning policy the assessment in this case is whether the proposals are accompanied by sufficient evidence to allow the Council to conclude that they either will deliver the outcomes sought; can do so with modification; or do not do so.

It would be wrong to state that any form of development would be appropriate in these locations. That has to properly be tested through the planning application process and consideration of evidence. Equally it would be wrong to adopt the view that no development is possible in any of the areas as the evidence and debate over the principle of development has been conducted at two EIP's, and found to be sound, effective and positively planned. So in summary the principle of development should not be argued about for the sake of it, that is contrary to Section 38 of the Planning and Compulsory Purchase Act 2004 but neither should inappropriate development be permitted where it would not deliver the outcomes sought by Core Policy 25 or fail to comply with the other relevant development plan policies, statutory requirements and national guidance.

The Council's Spatial Planning officers have also offered the following explanation of how the issues of the Masterplan, Community Benefits, and the amount of development should be approached:

9.17 Masterplan

The policy requires that a master plan should be developed which provides a concept for the development and indicates clearly how the outcomes required by the policy will be realised. In this case due to the heritage issues and the sensitive nature of the site, fairly detailed plans would be expected so that the impacts and benefits can be adequately evaluated. As with all master plans required in the Wiltshire Core Strategy, it is based on the concept that many issues may be overcome through working in partnership with the local community at an early opportunity. While there may not be consensus we would expect to see clear evidence of community involvement in helping shape the master plan, including clear indication of where valid community views have helped shape the scheme and the reasons others were not considered appropriate.

It is envisaged that after community engagement and iterations with consultees and the Council, that the final Master Plan be submitted with the planning application to set out a

clear context for the detailed plans and demonstrate how the development and its phasing will be delivered to meet the policy requirements.

It is for the case officer to consider whether the master plan fulfils its purpose as outlined above and ultimately for committee to make a decision on it. Clearly in this case heritage and landscape appraisal is essential amongst the other requirements. Also a draft 106 is required to ensure that there can be control over the flying activities.

9.18 Community Benefits

The level of community benefit requires an assessment. Clearly control over flying activities being a principle goal, but also enhancement, interpretation of and additional recreational value added to the historic airfield being important. Softening the impacts to and from Old Sarum SAM are also key benefits sought for the wider community through screening the 'raw urban edge' referred to by the Inspector and quoted above. Also any facilities that could have synergy with the housing across the Portway such as a restaurant and/or public house may be welcome.

9.19 Quantum of development.

There is no expectation over numbers and indeed it was not discussed at either of the two EIP's (Examination in Public). The quanta of development and its form/layout on the airfield will be determined by the requirements of the policy, in particular, to deliver controls over aircraft activities, to deliver a workable management plan for the preservation and future safeguarding of heritage assets, to mitigate the impacts of existing development, and to protect the amenities of residents living within the vicinity of the airfield. This judgment will be balanced against the need to ensure all other material and policy considerations are taken into account. These 'other' considerations include the impacts on scheduled monument(s), the conservation area, the wider landscape, established uses of surrounding land, and amenity in general. The areas defined in Map 5 do not indicate the extent of acceptable built development; the acceptable extent of built development can only be determined after the constraints of all the considerations have been defined and mapped.

The Master Plan and supporting documents should be key is reaching this assessment and is the vehicle for the applicant to set out their narrative for how the concept meets the requirements set out in the Core Policy 25.

Whether or not the planning application provides this definition, and then whether or not it uses this to map acceptable forms and layouts for the development, is a matter for the planning officer in conjunction with the specialist consultees to determine.

9.10 Housing requirement issues

It is noted that the documents already submitted by the applicants related to the forthcoming appeal process indicate that the applicants intend to challenge the Council's 5 year land supply and the Council's preferred method of calculation of those supply figures

Whilst policies CP1 & 2 relate to the provision of strategic housing sites, Members should note that any housing being proposed as part of this proposal does not form part of the overall housing allocation for Wiltshire. Any dwellings approved as part of any scheme would therefore be in addition to those already approved or allocated by the Core Strategy. As the Council has at the time of preparing this report a proven 5 year housing land supply, the proposed housing subject of this application is not required to meet land supply

requirements. It should also be noted that even if the housing land supply fell below the five year requirement in paragraph 49 of the NPPF, the presumption in paragraph 14 that permission should be granted unless 'any adverse impacts of doing so would significantly and demonstrably outweigh the benefits' is not engaged as the proposal directly affects designated heritage assets – including the Old Sarum Airfield Conservation Area which extends to cover all three of the proposed development areas within the site.

Members should note that a recent appeal decision received by the Council regards a site at Semington, where the Inspector confirmed that the Council's method of calculation of housing figures was indeed correct. These issues will be dealt with in detail by officers at the appeal.

As a consequence of the above matters, whilst the principle of some development, including some housing, is in principle accepted by policy CP25, the specific form, and quantum of any such development will clearly only be acceptable if the proposals are deemed to meet the requirements of policy CP25, and the aims of the Core Strategy as a whole. The following sections of the report deal with the consideration of the outline scheme as submitted.

9.2. Design, and overall impact on wider Conservation Area/heritage assets

Old Sarum airfield is a significant heritage asset. As outlined in Historic England's consultation response, Old Sarum Airfield has one of the most significant and complete groups of technical buildings representative of a Training Depot Station from the First World War period in the South West of England. It also, uniquely for any of the key surviving sites of the period up to 1918, retains its grass flying field with no perimeter tracks. Within the airfield perimeter are three surviving Grade II* hangars. They are formed from one single and two paired aircraft storage hangars. They were constructed in 1918 and are again relatively rare survivals from this period reflected in their Grade II* designation. Other Grade II buildings also survive within the site.

As a consequence of this, the Council commissioned a study to assess the significance of the airfield (the Atkins report referred to by third parties and consultees), and subsequently, the whole site has been designated as a Conservation Area since 2007.

The application sites also lies in an area of landscape significance, subject of adopted WCS policy CP51, and WCS policy CP58 in relation to both the Old Sarum conservation areas. The wider area also contains numerous historical features of interest, including the Old Sarum Ancient Monument and its Conservation Area. There are other listed buildings in the immediate and wider vicinity, including Longhedge House, and the nearby Tollgate house. Some distance from the airfield to the east is located Figsbury Ring Scheduled Ancient Monument.

There have been significant concerns expressed by third parties regards the overall design of the scheme and its wider visual impacts, particularly the impacts on airfield Conservation Area, the setting of Old Sarum Monument and Conservation Area, and the impact on the adjacent settlement of Ford.

Policy CP25 makes it clear that the design of the scheme should be informed by and derived from a Development Masterplan, and a Conservation Area Management Plan. The following analyses the submitted documents:

9.21 Development Masterplan issues

The supporting text of the above policy at the last line on para 5.121 indicates that:
“.....The Master Plan will be developed in partnership with the local community, local planning authority and the developer prior to any application being considered.”

A number of third parties have expressed the opinion that this current scheme and application should not be considered positively unless some form of overall Masterplan document is first agreed between the parties and the local public, and formally adopted by the Council.

In this instance, the applicant has chosen to draft a document, and submit it with the application. The document proposes a development framework, to address the following issues:

- Maintain flying activity
- Improvements to public access
- Improvements to presentation of the historic relevance of the flying field and associated aerodrome buildings
- Repairs and regeneration
- Improving the setting of Old Sarum Monument
- Community benefits

It is the applicant's position that the document and its contents have been discussed with all relevant parties of the last few years, and the document altered to reflect any relevant comments. The quality of the public consultation undertaken to inform the document has however been disputed by several third parties, who have generally indicated that the document was not drawn up in partnership with others, and its contents therefore do not reflect the views of the local community.

From the Council's point of view, it has no immediate plans to endorse or adopt the current Master Plan document, as a Development Plan Document. Indeed, as it has now been submitted as part of the evidence base associated with this planning application, such an endorsement would prejudice consideration of the planning application, and any adoption timetable would inevitably take many months, particularly as public consultation would be involved. Based on current third party and other consultation responses, it seems unlikely that any such formal document would be agreed between the parties in a speedy fashion without significant adjustments to the document and its contents, which ultimately may require revisions to the submitted planning application scheme. It would appear at the time of writing that the applicant does not wish to significantly adjust the submitted scheme or the associated supporting documentation. Therefore, whilst the ideal scenario would have been

that a previously agreed and adopted Masterplan would have been developed prior to this application being submitted, ultimately, the applicants are entitled to submit a formal planning application with what they consider to be appropriate supporting information and ask for it to be considered by the Local Planning Authority.

9.22 Conservation Master Plan issues

Criteria (i) of the main policy text states that: “..... *A long-term proactive strategy for the enhancement of the Conservation Area including management plan and public access and visitor/interpretive material on its historic relevance.*”

The issues proposed for resolution by the document are:

- Maintaining flying activity
- Mitigating noise nuisance from flying
- Improving the relationship between the listed hangars and the grass strip
- Improving the view of the airfield as a whole, particularly from Old Sarum Monument
- Improving other parts of the Conservation Area
- Maintaining the economic viability of the airfield so that it will be in beneficial use
- Removal of inappropriate agricultural uses
- Improving equal access to the site for users and visitors
- Opportunities for enhancement and guidelines for future development.

Third parties have suggested that some form of Conservation Plan should have been agreed and adopted by the Council prior to this application being considered. In this instance, the applicant has chosen to draft a document, and submit it with the application. However, both Historic England and the Council’s Conservation Officer have criticised the document and the Masterplan. In particular Historic England has indicated that:

“.....the Core Strategy Policy requires a management plan for the conservation area together with agreement of a development master plan, which should seek to deliver a high quality development that takes opportunities to enhance the historic environment and protect the amenity of existing residents.

Whilst these documents have been submitted, Historic England believes that the master plan has yet to be agreed with various stakeholders and that the management plan is not a robust enough document to provide the delivery of the appropriate level of repairs and long term management for those heritage assets that are in the ownership of the applicant.

Both documents provide limited indications of the quality of the new development, together with an appraisal demonstrating how the overall scheme will enhance the significance of the existing designated heritage assets.....”.

Similarly, the Council’s Conservation officer offers the following on this specific point

(The policy)... requires the delivery of a 'long-term proactive strategy for the enhancement of the Conservation Area including management plan and public access and visitor/interpretative material on its historic relevance'. The starting point for developing such a strategy is the appraisal written at the time of designation, identifying specific issues that need to be addressed in addition to opportunities for enhancement. The way in which these matters are addressed should be in accordance with the English Heritage's (now Historic England) Conservation Principles and guidance on the writing of CA management plans. The document's recommendations and solutions need to be acceptable to the local planning authority, which means that public consultation (by the LPA, or in line with the LPA's requirements) on this specific document is essential in order to gain wider input and identify priorities for the whole CA, not just the elements currently within the applicant's control.

...The substantial document provided with the application is primarily a second appraisal of the airfield, with some enlargement upon its conclusions in the Development Masterplan. There appears to be no distinction between those areas excluded from the CA and those within. The supporting text of CP23 requires that the masterplan should be developed in partnership between the major landowner, the council and local community. This has not been the case.

Clearly, based on the above, it appears that there are issues with the form and content of the Conservation Management Plan, and this will have affected the acceptability of the scheme.

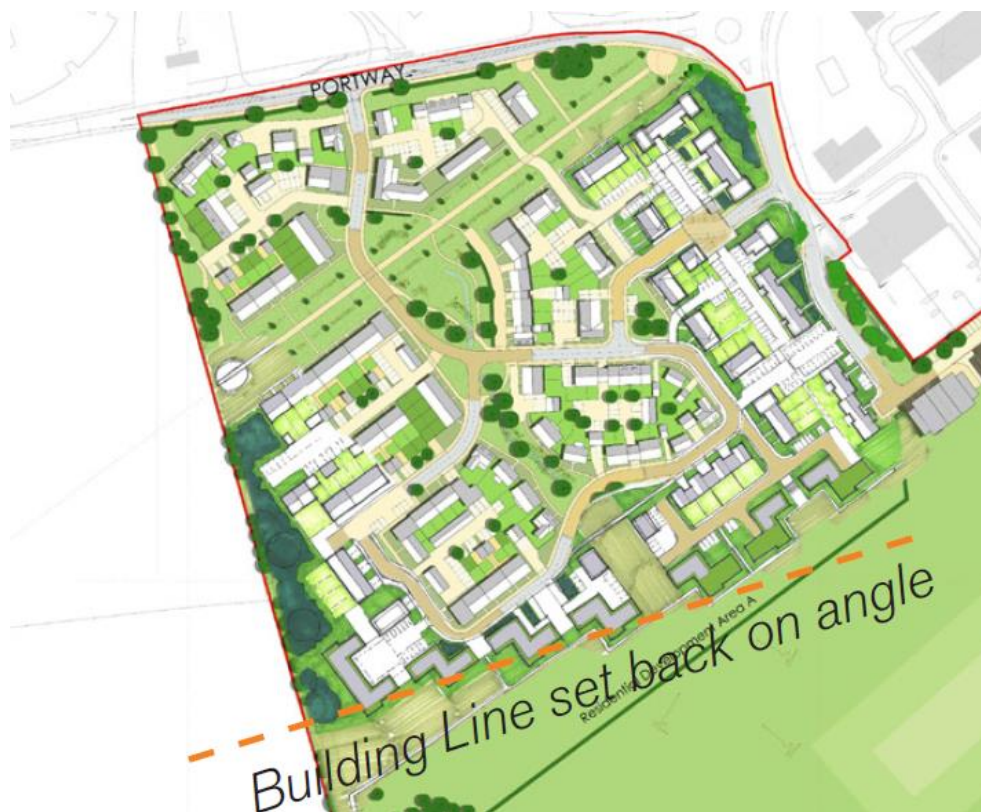
9.23 Overall design issues

Notwithstanding the issues with the above documents, concerns have also been expressed by various parties and consultees regarding the impact of the proposed development sites. The following summarises the issues:

Area A

This land is currently of an open character laid to scrub, with some small single storey buildings sited to its northern edge. It is bounded by hedging. The land (and that for Area B & C) is clearly visible from the surrounding area, including the adjacent Old Sarum Monument, and the Roman Road serving Ford, as is the adjacent airfield and commercial buildings, and also the more recent developments of Old Sarum and Longhedge. The site is and will be readily visible looking northwards from the higher land associated with the emerging Country Park to the south of the site. One of the aims of CP25 is consequently to produce a high quality strategic landscape improvement to mitigate impacts of existing intrusive buildings, to soften impacts when viewed both out and into the Conservation Area and from Old Sarum SAM.

The applicants have submitted a Design Code which outlines the type and form of development and materials which could be utilised. The intention being that a planning condition could be imposed on any future approval which tied any future development to the design principles in the Design Code.



The applicant originally proposed up to 310 dwellings on this part of the application scheme, but following discussions this was reduced by the applicant to a maximum of 302 dwellings. The southern edge of the development was also adjusted and moved back away from the airfield, in an effort to improve views from Old Sarum SAM.

The layout of the scheme would retain the route of an old roman road which originally ran from the end of the adjacent Portway road, towards Old Sarum Monument. Dwellings would then be arranged around this feature, and also around a centralised area of open space, which would also serve as a drainage area, as the land naturally dips at this point. Landscaping is proposed along the western edge of the development, with vehicular access being created off the Portway road to the northern edge of the site, and to the north east, off the existing road system that currently serves part of the adjacent industrial estate and the airfield. The creation of the accesses would result in the loss of part of some of the existing mature hedging which sits along the northern, and north eastern boundary of the site, with the latter currently serving as a partial landscaping screen to the adjacent industrial buildings.

The submitted indicative details for the this area show a housing development of somewhat contemporary design, with the tallest buildings located adjacent to the airfield perimeter to the south east, and also adjacent the north eastern boundary of the site adjacent to the commercial buildings and airfield beyond. The applicant's concept is to provide a development which would be attractive to occupiers whom may wish to be located close to

the airfield operations, and thus the tallest properties (three storey apartments as illustrated) would face towards the adjacent airfield. As no meaningful landscaping is shown along this elevation, the proposed apartments would be readily visible from the south from the emerging Country Park area.

Whilst more significant linear landscaping has been suggested along the western edge of the development, given the overall massing of the residential buildings being proposed, it would seem likely that any such landscaping would only serve a general softening role in terms of the visual impact of the development. It may also be possible to introduce tree planting within the central core of the Area A layout where a linear open space is suggested, and this would soften the overall development.

Even so, when the development is viewed from a greater distance from higher and rising land to the south and west, such landscaping is unlikely to be able to screen much of the development proposed for Area A, particularly given the height of a number of the properties, some of which are suggested to be 3 and 4 storey apartment blocks and three storey houses. The applicant intends that such apartment blocks could also perform a screening function in respect of the large commercial building on the adjacent industrial estate, although this is not explicitly stated in the Design Code.

The applicant's Design Code indicates that the development would be distinctive and of high quality, and take their architectural appearance from the historic airfield buildings, with a combination of traditional and contemporary details and materials, to create a development with its own identity. Sketches within the design code document suggest dwellings of brick with contemporary standing seam metal style roofing or more "traditional" townhouse design and materials reflecting those already permitted on the adjacent Old Sarum development. The applicants have also submitted supporting photomontages and sectional drawings.

A number of consultation responses identified in section 7 of this report have raised concern in a general sense with the impact on the surrounding area of the overall development proposed including Historic England and CPRE with The Salisbury Area Greenspace Partnership, Council for British Archaeology, the Council's Conservation Officer and Councils Urban Designer also making specific reference to Area A.

The Council's Urban Design Officer has raised detailed concerns regarding Area A particularly in relation to the coverage and scale (mass(ing) and height) of development presented and the visual impact this would have on the context and setting of the Old Sarum Ancient Monument, the airfield complex and settlement of Ford but also regarding the layout of Area A which is also of concern to the Wiltshire Police Design Advisor.

Wiltshire Police Design Advisor also expressed concerns about proposed layout as it shows a lack of defensible space, poor parking arrangements distant from the dwelling, restricted surveillance, and excessive permeability, contrary to national and local policies.

The impact of Area A is also of concern to Historic England, which indicates that:

We have concerns that the proposal for residential development within the application at Area A will cause harm to the setting of Old Sarum Scheduled Monument. Old Sarum is prominently located upon an isolated hill and forms a dramatic and imposing presence in the view for some distance when approached

from any of the historic routes leading to it, including both modern highways and ancient Roman roads. The immediate environs of the hillfort are currently almost entirely free from modern or intrusive development, and this together with the massive hillfort ramparts perched upon their isolated hilltop gives the impression of Old Sarum as a dominating and powerful presence in the landscape.

The views out from Old Sarum are equally dramatic and provide the viewer with a readily appreciable experience of the commanding and dominating relationship that the hillfort (and later the castle) has over the lower lying surrounding predominantly agricultural land. Old Sarum Airfield is prominent within this viewfield and the western part of the airfield, being laid to grass rather than tarmac or concrete, forms part of this apparent rural continuum, giving the impression of a largely agricultural landscape dominated and surveyed by the fortified site at Old Sarum. This is considered to be an appropriate type of landscape setting for a major hillfort.

However, incremental development - chiefly of a residential character - is eroding the wider landscape setting of Old Sarum to its north-east. Thus far, such development has been restricted to the north side of the south-west - north-east aligned road known as The Portway. The open green space of the airfield has served as an effective buffer in preserving the impression of an agricultural setting for Old Sarum, particularly for a viewer looking out to the east and north-east from the main viewpoint on the hillfort ramparts, despite the addition of later industrial units to the west of the original airfield buildings and hangars. Intensive residential development such as that proposed within Area A will undoubtedly have a negative impact within that viewfield and bring the developed edge of the Portway suburb into sharp focus when viewed from the hillfort....

....It is our view that the development currently proposed for Area A will not serve to achieve this purpose of the Policy, but rather will have a harmful negative impact when viewed from Old Sarum, such that it would cause harm to the significance of this nationally-important, designated heritage asset. We question whether such a large area of intensive residential development is necessary to deliver the high quality strategic landscape improvement envisioned by the Policy, and whether a smaller area of development, not necessarily residential, would deliver this objective of the Policy without causing harm to the setting of Old Sarum..”

The Council's Conservation officer has indicated the following regards the adjustment to Area A:

“..The area has had its southwestern corner cropped, apparently to limit the impact on views of the airfield. This aim is welcomed but the reduction is insufficient to achieve anything close to maintenance of the existing view. The loss of the clearly defined rectangular block of existing airfield and later industrial development would be an adverse impact on the character of the CA and views of it from OSC..

...Photomontages.

The montage shows that the view from Old Sarum Castle over the airfield would be significantly impacted by the proposed development. The houses in Area C are clearly visible creeping up the slope toward the crown of the airfield and creating a form of built enclosure currently not present, conflicting with the rural character of the CA's setting. The view of the landing strip itself would be obscured by buildings in Area A, even with the

slightly reduced extent of development; these buildings also introduce a multitude of roof types and orientation, contrasting with the near uniformity of character of the existing buildings at the western end of the airfield; and while shown as an innocuous soft green colour, the new hangar-style buildings of Area B clearly intrude into the open space of the airfield and compromise its character and the setting of the LBs, all as described in the earlier consultation response...

The overall layout of the dwellings in Area A as suggested would appear to following a generally "traditional" housing layout format similar to other modern housing estates with normal parking arrangements and areas adjacent to dwellings or within plots, and with feature buildings at prominent points throughout the development.

However, the Design Code also suggests that some dwellings would be designed with elevated rear gardens at first floor level above either living accommodation or internal garages. This kind of design is somewhat unusual in what is a suburban context, and whilst may not be unacceptable in itself, it does suggest that the number of dwellings in Area A may have caused the applicant issues in terms of meeting the Council's parking requirements, and thus that there may be a case for reducing the number of dwellings in area A.

Officers are similarly concerned that the provision of a number of 4 storey apartment blocks within the scheme (largely along the northern and south eastern edges although some dotted through the scheme) would be somewhat out of keeping with the character of the area. Although the surrounding area does indeed contain multi-storey apartment blocks at the Old Sarum and Longhedge sites, and the Riverdown Park housing development to the south of Roman Road, these buildings are not quite as tall as those suggested for Area A, and are located within a different context. Area A is considered to be a more prominent site than either of these three sites given the open nature of the landscape at this location and the visibility.

Officers also remain to be convinced that even well designed apartment blocks of the scale suggested may help alleviate the existing visual detriment to the landscape caused by the existing industrial buildings, particularly as the designs are illustrative only due to the outline nature of the application. Whilst the Design Code could be conditioned to any approval, the Design Code as currently provided is a rather generalised document which is considered to leave a degree of flexibility which would allow normal standard house types and materials to be used. However, to achieve the number of dwellings sought by the applicant on this part of the site, building higher than a standard two storey building would be required, but this begs the question as to whether the number of dwellings sought in this area is appropriate, given the sensitive landscape setting.

Thus, officers also remain to be convinced that a scheme based on the current numbers, Design Code and indicative layout would provide a high quality residential development with a high quality strategic landscape improvement that would satisfactorily mitigate the impacts of existing buildings and be in accordance with the criteria set out in Policy CP25.

Impact on Beehive Toll House - This grade 2 listed building is located some distance to the south of Area A. Its immediate setting and context was altered significantly a number of years ago with the construction of the park and ride complex and the associated roundabout

and access junctions. Given this, and the distance from the application site, it is considered that the character and setting of the building is unlikely to be affected to any significant degree.

Area B

Area B is located along the east facing edge of the existing airfield and adjacent commercial buildings. It is readily visible from the surrounding landscape. Part of the reasoning behind Core Policy 25 is to mitigate the visual impacts of the existing buildings in this location, particularly the modern industrial buildings.

The proposal envisages a number of buildings along this edge. Some of the buildings are located to the southern section of Area B, whilst others are located to the northern part of the Area. This layout is in relation to the listed hangars, with the intention being that a visual gap is left between any new development which would improve the setting of the listed hangars, along with the removal of other ancillary clutter and buildings in this area.



The Council's Conservation Officer and Historic England have raised concerns regards the development suggested in this area. The Conservation Officer indicates that:

".....The proposed range of buildings in Area B would be parallel with the historic building line but nearly 100m forward of it. In visual terms, these would bring a unified appearance to the airfield side of the industrial areas, largely hiding the industrial buildings from southern views.

The hangars are clearly the most important buildings within the CA. Views of and from them, and their physical relationship with the grass field, are of the utmost importance to their significance and that of the CA. The identified extent of their setting as proposed in the application (Development Masterplan p18) is a very simplistic interpretation and has several

failings. In my view, the proposed buildings would leave the old buildings behind, set back from the active airfield behind the line of new development. The relationship between the hangars and the grass would be severely compromised by the loss of the sense of proximity: when stood at the airstrip side of the hangars, the new buildings would reduce visibility of the airfield and the wider landscape, and one could no longer experience one of the most important characteristics of the buildings' setting and the CA, perhaps best considered by asking 'how did it look to a WWI airman?'. The form of development with their unified style would introduce a strongly dominant line of substantial buildings, having a substantially negative imposing effect on views of the hangars from within the airfield and longer distance views from the east. Furthermore, the line of the buildings would reduce visibility of the hangars in angled views from both directions. The hangars would also extend the area of airfield concealed from the view from OSC, further decreasing the open character of the airfield and its views.

The D&A does not describe how the concept design for these buildings was reached, and the design does not form part of the outline application. Nevertheless, they are shown as large, elaborate and possibly architecturally unusual buildings with a huge sense of presence. It is not considered that there is any characteristic relationship with any existing buildings of the CA, which are rather utilitarian in their appearance, and their presence would further diminish the prominence of the existing buildings having an adverse impact on the setting of the LBs and the character of the CA..."

Historic England indicates as follows:

".....The development will protrude onto the land that is identified as the grass airfield, an important element of the setting to the listed hangars and a unique survival from 1918. By implication the present airstrip will need to move south away from the terminus building and more importantly the listed hangars that serve to store the planes, harming their setting and historic relationship. We also question how viable the residential hangars maybe, how compatible their use is in conjunction with the commercial uses that presently dominate the site and how this use may undermine the essential characteristics of the airfield".....(NB – the residential use of the hangars has now been omitted in the amended plans).

6 hangar buildings are proposed in Area B. The applicants design code contains only a limited amount of information regards Area B, but indicates that these hangars would be up to 11 metres high. These hangars had originally contained residential accommodation at first floor level with hangar space on the ground floor, with the original intention apparently being that aircraft users/owners would occupy the accommodation occasionally and keep their aircraft on the ground floor. However, during the course of the application, this element of the application was withdrawn by the applicant. As a result, the sketch elevations and floor plans that were originally submitted with the application are presumably superseded, although it does not appear that further revised elevations of the hangars have been submitted to the Council as part of the application. This is important as the original elevations clearly had a residential character particularly on their visible east elevations, which contained first floor glazing and balconies serving the residential use. It is presumed that buildings simply intended to operate as aircraft hangars would be simpler structures with far less need for glazing. This would then affect the visual appearance of the buildings and their visual impact.

Notwithstanding this, it is unclear why any hangars would now need to be up to 11m in height. Whilst the applicant's intention was to produce buildings which would screen the existing industrial units, officers are not aware that a detailed assessment of the comparative height of the adjacent industrial has been undertaken or submitted to the Council by the applicant, and therefore no justification of this height limit/requirement is provided at present.

The other suggested buildings along this eastern edge include a new control tower, aviation building, and archive building, together with a building initially intended to be occupied by the Royal Aeronautical Society. However, the applicant has since advised that this user has now chosen not to occupy this building. Furthermore, the applicants Design Code document indicates that all the buildings in Area B would be up to 11metres in height, and the sketches submitted regards these various uses seem to suggest quite substantial buildings, particular the replacement control tower, which is shown on the sketches as being taller than other Area B buildings. However, no justification has been submitted which explains why these buildings need to be of the scale suggested, and the overall scale of the restaurant use and the new control tower seems to be well in excess of the modest scale of the existing control tower and on site café. It is also noted that the applicants submitted environmental statement drawings indicates that Area B buildings would be up to 14 metres high.

Whilst it is accepted that in improving restaurant facilities some increase in scale is acceptable, the applicant has not explained in any detail why the new control tower needs to be of the scale suggested to serve the needs of the airfield now or as intended by any future agreed restrictions.

The original plans for Area B (in the Development Masterplan) also indicate a total of 514 car parking spaces. However, as the scheme has been adjusted since the submission of this document with the removal of one hangar building and the removal entirely of the residential accommodation within the hangar buildings, it is unclear whether this level of car parking is still proposed or if it is, whether it is still justified. In this regard, it is also noted that the layout of the buildings in Area B differs between that shown in the applicants Masterplan document, and the Area B drawings. Thus, this will need to be clarified during the appeal in relation to which version of the layout forms part of the appeal.

Whilst matters such as scale could be dealt with via any future reserved matters application, if the current Design Code document was to be conditioned as part of any outline consent, this would make it very difficult for the Council to refuse any buildings along this eastern edge which would be approximately of the scale suggested in the Code or submitted sketches. It should also be noted that there is limited reference in the design code to Area B, and thus if the document was conditioned, it would offer very limited controls of the future design, scale, layout or appearance of the buildings along this edge.

Therefore, whilst in principle, the provision of enhanced facilities associated with the operation of the airfield and its business, as well as to provide ancillary uses which have a synergy with the airfield operation is welcomed, in the absence of suitable justification or details of the scale or design of the buildings, or clarification regards the overall height, officers remain to be convinced that the buildings being proposed along this very visible edge could not be reduced in scale and height considerably, and thus the final visual impact of the scheme on the heritage assets and surrounding area could not be equally reduced, as well as potentially reducing the cost of construction.

Repair/enhancement to Listed Hangars and other buildings on site

The applicant's submitted scheme indicates that as part of the overall development of Area B, repair works to the listed hangar(s) will take place. It is assumed that this refers primarily to Hangar 1, which is understood (from Historic England) to be in the poorest condition, although some of the applicants appeal submission either refer more generically to 'hangars', and Hangar 3 is referred to in the Development Masterplan, so some clarification seems to be required on this matter.

The applicants appeal viability report estimates that these repairs would cost some £3 million pounds, and gives a brief run-down of the works which need undertaking. Such a cost raises a query regards whether the likely extent of works could now fall within the scope of repair as original suggested, or whether a formal listed building consent application may be needed.

Such repair is of course welcomed in principle. However, Historic England has stated the following:

"We note that the conservation management plan states that the refurbishment of Hangar 1- the worst condition of the three Grade II hangars- together with the provision of a museum and café will help to bring life back to the airfield and the specific heritage assets. However, without a thorough condition survey of the listed structure, an agreed and costed schedule of repairs, or a business plan for these aspects of the scheme, we are unable to see how this can be delivered. We are, therefore, concerned that there appears to be no robust mechanism to secure the long-term future for the designated heritage assets, in particular the 3 designated hangars on this site. We also question the long-term viability of the airfield given the large number of residential units that are being proposed and how compatible this use is with a working airfield."*

Similarly, the Council's Conservation officer has indicated:

"...The buildings which are within the control of the applicant are believed to be Hangar 3, the control tower, squash courts and machine gun range. In the outline planning application, works are not proposed to any of these. There is a stated aim of restoring the hangar, although there is no evidence submitted of a survey identifying the extent and nature of works required; the proposal for the repairs to be carried out by apprentices under the supervision of non-specialists is not an appropriate approach given the sensitivity of the buildings and the level of craftsmanship required. It is considered likely that the works of repair will require LBC, not least because some of the roof may need to be dismantled in order to effect the repairs.

Notwithstanding the hangars, whilst the existing squash courts and machine gun range are shown within the red line of the application site and mentioned in some of the applicants documents, it appears that no enhancement works are proposed to these buildings.

Consequently, as part of any appeal, the Council will need to seek clarity of the exact scope of works and which buildings/ hangars are affected. At the current time, based on this lack of clarity, and without a detailed S106 agreement to secure such works or funds, officers have included this matter within the reasons for refusal.

Area C

The proposed plans suggest up to 160 dwellings in this location. Again, this site is readily visible, both from the Roman Road, and the wider area to the south east, around Ford and the Country Park. Equally, it would be readily visible from Green Lane.



The Design Code and submitted sketches and layouts offer what appears to be a suburban style development, which if suitable conditioned, may in general terms result in a scheme which could be generally acceptable (in design terms). However, the applicants own landscape visual assessment document indicates that some of the roofs of the dwellings, and also the northern most part of the housing in Area C would be visible from the environs of the aircraft hangars, and from the Old Sarum Ancient monument.

This matter has been raised by Historic England, who has commented thus:

“.....Whilst there may be scope for some form of low key development in this part of the site, we are concerned that the ridges to some of the proposed dwellings will start to impinge on the sightlines from Old Sarum and within the Conservation Area. There are no cross sections to help illustrate the relative heights of the proposed and existing units but the introduction of houses within the topographically higher area of this part of the airfield will be more visible from certain viewpoints around the site. Additionally, the units shown located on the far eastern side will be more intrusive as the land on this side is higher and appears to rise up towards the northern side of the airfield putting this part of the development into visual contact with the working airstrip. This will also be harmful to the open character of the airfield and Conservation Area.....”

The Council's Conservation Officer has also indicated that:

“...The southeastern corner of the airfield is the least sensitive in terms of its direct contribution to the setting of the listed buildings, but remains a large expanse of open grassland contributing much to the character of the CA. The scale and disposition of the proposed houses means that their roofscape would also be visible from OSC, detracting from the open character of its views. Although the ridges of existing houses at Ford are visible, they are largely screened by trees on the airfield boundary; the proposed houses would be on higher ground and much more visible, and would be perceived to be much closer to the frontage of the existing hangars. As a combination of effects, this is considered to be a high, if not substantial, level of harm to the designated assets...”

Similarly, the Council's Urban Design officer and other third parties have indicated that when viewed from the Old Sarum Monument, Area C is likely to visually overlap with Area B. The applicants perspective photomontages seem to suggest this also.

Whilst some cross sections were subsequently submitted by the applicant as part of the Design Code document which appear to illustrate that housing in Area C could be design and dug in to the land so that they may not be visible, to allow an accurate assessment of this matter would require fuller details of the design of some of the relevant dwellings, and fuller details of ground levels. At this point in time, it is not clear whether a detailed survey of the levels of the land in Area C has been undertaken by the applicant, and thus it is not known how much excavation may be required to lower any dwellings below the sight lines, or indeed, what the visual impacts of that work may be on the house designs or the overall design and appearance of the scheme. It does not appear that the other details within the design code adequately show any such revised designs. Thus the conditioning of the Design Code as part of any outline consent would not lend limited assurances in this regard in relation to future applications.

Summary on design issues

As a result of the above, it is considered that it is the quantum of development being proposed by the applicant that appears to be the main source of many of the issues, and the apparent scale (mass(ing) and height) of the development. Officers have asked the applicant to reduce the amount of housing in Areas A & B on a number of occasions. Whilst a modest reduction was undertaken to Area A, the planned 302 dwellings would appear to result in a built form that would be unsympathetic to the area, and have an adverse impact on the wider airfield Conservation Area, and the Old Sarum SAM Conservation Area. Similarly, if the amount of dwellings was reduced in Area C, this would reduce its likely visual impact on the airfield Conservation Area and the Old Sarum SAM. With regards Area B, the main issue is that the details for this part of the scheme are sketchy, and have been partially adjusted during the course of the application. Thus there is currently limited and conflicting detail regards this part of the scheme which makes it difficult for officers to recommend it positively at this stage.

The Act requires that special attention shall be given to the desirability of preserving or enhancing the character or appearance of a CA when considering proposals for development. It also requires special regard to be paid to the desirability of preserving the character and setting of listed buildings. The NPPF provides further advice for how local planning authorities should consider planning applications affecting heritage, using the terms 'substantial' and 'less than substantial harm': the former should be only be considered in

exceptional circumstances, while the latter may be weighed against the public benefits of a scheme.

Based on the concerns of Historic England and the Council Conservation Officer, the impact on the Conservation Area as a whole is considered to be the most serious, in terms of causing “substantial harm”. The setting of the listed hangars and their relationship with the grass airfield would also be significantly compromised, with the harm caused being “less than substantial. Similarly, the harm caused to the setting of Old Sarum Monument would also be ‘less than substantial’.

The NPPF (para 133) states that proposals that would cause substantial harm to a designated asset should be refused ‘unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss’. In officers opinion, based on existing submissions, the public benefits being offered would not outweigh the harm caused, and as a result, officers have advised that a refusal regards these matters would be warranted.

9.24 Community and Public Benefits

Policy CP25 highlights that any scheme should provide community benefits. Policy R2 of the WCS also deals with the provision of suitable open space and play areas to serve a development. Policy CP49 covers the provision and enhancement of community facilities.

The applicant’s Development Masterplan lists the community benefits of the scheme as follows:

- Provide a long term future for the airfield and promotion of flying activity
- Better access to, and visibility of, and understanding of the historic airfield
- Improvements to the setting of the Old Sarum SAM and the airfield
- A restaurant/club available to the public
- Air shows which will be a tourist attraction
- Improved links to public transport
- Reinstatement of the line of the Roman Road at the west end of the Portway

However, at the rear of that document, the community facilities are listed simply as New Footpaths, Viewpoints, Picnic Areas, New cycleways. A similar list has been provided as part of the appeal submission S106 matters (see separate section). Notwithstanding this discrepancy some of the matters listed above would be difficult to secure unless there was a completed legal agreement, and with regards to the new restaurant/club, whilst welcomed, it would be difficult to ensure that this was maintained for community rather than private benefit. With regards the Roman Road extension, whilst this can be secured with the Area A development, the extension of that route into the adjacent pig field cannot be achieved as the land is owned by a third party. The Air shows may well be a tourist attraction, but are not really considered a community benefit in the normal sense.

Open space, play areas, footpaths and cycleways

The outline scheme suggests the provision of small areas of public open space within Areas A & C, and also indicates that the areas of open land and landscaping between Area C and the airfield, along Roman Road, and the open and landscaped area adjacent the western boundary of the airfield leading up into Area A would also be utilised for more informal public open space. Within these areas, areas for picnicking would also be provided, served via a footpath/cycle pathway.

The Council's open space officer has no objections to the suggested provisions of open space, provided they are secured via a suitable S106 Agreement. However, as the Council no longer adopts areas of open space, such spaces would either need to be provided and maintained in perpetuity by the applicant, or by another body, usually the Parish Council.

However, in their draft Heads of Terms submitted as part of the appeal process, whilst the applicant has indicated that the scheme would provide for the footpaths/cycleways and public picnicking areas and viewpoints, the document is silent on whether the applicant is willing to provide and maintain the areas of public open space and the play areas, and officers are not aware of any discussions regarding a third party such as the Parish taking on and maintaining such provision, as has occurred to the south of the site at the Bishopdown Country Park. Notwithstanding, without a formalised S106 agreement, such provision cannot be secured.

As a result, at this time, officers are recommending that the scheme would have been refused on the lack of a suitable S106, which secured such provision, and which also provided for the long term maintenance of such provision.

9.3 Impact on amenity

9.31 Noise issues from aircraft

One of the main aims of Policy CP25 is to secure noise controls over the existing airfield operations, as a result of historic complaints from surrounding residents. Notwithstanding any historic complaints and issues there may have been related to airfield noise, in recent months, the Council has received further complaints regards the airfield operation, following an increase in flying operations, including helicopter training.

The NPPF indicates the following:

“123. Planning policies and decisions should aim to:

- *avoid noise from giving rise to significant adverse impacts⁴ on health and quality of life as a result of new development*
- *mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions*
- *recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established⁵*
- *identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”*

More specifically, the Aviation Policy Framework 2013, states that:

“.....The Government recognises that noise is the primary concern of local communities near airports and we take its impact seriously.

17. Our overall objective on noise is to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. The document makes clear that the acceptability of growth in aviation depends to a large extent on the industry continuing to tackle its noise impact and confirms that the Government expects the industry at all levels to continue to address noise...”

Whilst most of the above document relates to the operation of larger airports, Section 3 of the document covers noise issues in relation small aerodromes, and states:

“..General aviation and helicopters

3.42 The Government recognises that aviation noise is not confined to large commercial airports and that annoyance can also be caused by smaller aerodromes used for business and general aviation (GA) purposes, especially at times of intensive activity. However, it would not be appropriate for the Government to intervene by exercising powers under section 78 of the Civil Aviation Act 1982 to set noise controls at small aerodromes. Industry has developed codes of practice and the CAA has produced guidance. We would encourage the GA sector and the CAA to review their respective best practice and guidance to reflect the policy adopted in this Policy Framework. We would also encourage the sector to monitor compliance with its codes of practice.

As indicated above, the Government stance with regards noise disturbance seems to suggest that it is the responsibility of the aerodrome and the CAA to alleviate any noise issues.

As stated elsewhere in this report, one of the main aims of CP25 is to improve the amenity of those residents living close to the airfield, and to secure controls over the airfield as part of an enforceable legal agreement. As explained, flying operations at the airfield are not currently subject of any controls, and the only way for the Council to impose such controls would be via an agreement with the airfield operators. Core Policy 57 of the WCS generally deals with amenity and disturbance issues.

Current situation

The applicant and the Council have had ongoing dialogue regarding the impacts of the development and how to secure meaningful and enforceable controls over future airfield activity.

The Council's public protection officers have indicated that their current position is that they currently maintain an objection due to noise impact from the use of the air field on future residents of areas A and C, and indicate:

“Following detailed negotiation with the applicant's representatives a suitable level of noise exposure for future residential properties was agreed. The agreed sound levels could be met by either some control over flying compared to the 2014 levels which were used in submitted noise assessment, or by moving a small percentage of proposed residential properties in areas A and C further away from the airfield. The applicant subsequently withdrew their agreement therefore, in the interests of future residents refusal is recommended.

The applicant is currently proposing 50 000 movements per annum for the airfield to be viable. However, the noise assessment submitted with the application used the flight figures for 2014 when there were 35 000 movements. As stated above, there would need to be some control over even this level of flying for suitable sound levels to be achieved. Without strong evidence that flying activities could be controlled so that suitable sound levels can be achieved an increase from 35 000 movements could not be supported.

Should the development go ahead, very detailed Section 106 terms to control aircraft noise into the future would need to be agreed.

Other outstanding noise issues which include a pistol range, adjacent industrial uses and road traffic on the Portway can be controlled through conditions. A condition regarding contaminated land would also need to be attached.

The Council's public protection officers have also indicated that they no longer support an objection based on Air Quality impacts. A diffusion tube was moved to Castle Road in light of the Air Quality Assessment accompanying the application. 18 months of data is now available and although we would not seek refusal on this ground we would wish to see the AQA revisited in light of this new data or significant mitigation measures such as ULEV infrastructure, public transport support etc included in any conditions attached should the Inspector be minded to grant this application..”

Imposing controls via legal agreement

As indicated above, negotiations have revolved around limiting flight numbers and the type of aircraft authorised to operate at the airfield, and could also involve limitations of special events and aircraft training flights. Such matters could be controlled via a very detailed S106 legal agreement as referred to in policy CP25.

However, in recent months the applicant has apparently increased flying activities at the airfield, including the introduction of helicopter training flights, which have resulted in additional complaints to the Council regards noise disturbance. However, it is unclear whether these additional flights have been included in any updated noise assessment, and it is also unclear whether these additional training flights would be able to be controlled or stopped by legal agreement, due to existing contractual arrangements.

Notwithstanding, at this time, no firm S106 has been agreed with the Council, and the applicants information submitted with the appeal documents does not specify in detail what forms of agreed controls they may wish to propose or agree to. The situation is complicated by the fact that the applicants have suggested that if stringent controls are placed on the airfield which significantly affect the number and type of flights, then it may affect the viability of the airfield. As the viability issues surrounding the airfield have not yet been agreed, it would therefore be very difficult at this time to agree detailed controls over the airfield, as the aim of CP25 is to retain and enhance flying operations at the airfield as well as limiting the impact of the operations. Thus, some kind of balance has to be reached between amenity and retaining the function of the airfield, but if the level of flying sought is high, to achieve viability, it raises the issue as to whether there will be any material improvement in the amenity for local residents.

Officers have therefore suggested a reason for refusal based on this issue and lack of a suitable Agreement.

Impact on new dwellings

This proposal suggests locating additional new dwellings adjacent to the realigned runway, in particular the suggested dwellings in Area A and C.

Aircraft noise is a very technical and specialist area. The applicant submitted noise assessments which he suggests indicate that there is unlikely to be a significant impact in terms of noise on the residents of the planned Areas A & C, with only some of the planned dwellings being located within the defined noise contours which emanate from the runway.

However, at the current time, there is disagreement on this matter between the applicants and the Council's Environmental Protection Team, who is currently objecting to the proposal, and have indicated that they would wish to see the two housing areas reduced in size so as to remove all the dwellings from the harmful noise contours.

At the current time, the applicant has refused to amend the scheme further to either reposition dwellings or reduce the number of dwellings in Area A & C. Consequently, at the current time, there remains an objection from officers on the noise impact of flying activities on planned dwellings.

9.32 Aircraft and public safety issues

Concern has been expressed by various third parties regards the suitability of locating development within such close proximity to the operating airfield and airstrip.

Guidance from Central Government in the NPPF and related airfield advice documents indicates that aerodromes should seek to agree Safeguarding Zones around their airfields with the relevant Local Authority, and the Civil Aviation Authority (CAA), publishes guidance for aerodrome operators on various issues, including safety zones. Wiltshire Council has information related to the aerodrome which was previously agreed with Salisbury District Council. The information is not substantial, and largely refers to limitations on the height of any development within certain distances of the airfield and airstrip, above which consultation should occur with the aerodrome for its views on the development.

In past years, officers from the LPA have on occasion been involved with development adjacent the existing grassed runway, within the existing commercial areas. The general thrust of the safeguarding advice in this area has historically been that development in that zone may be possible, provided certain height restrictions applied. Indeed, some years ago, the LPA won an appeal in relation to the likely impact on airfield safety of a two storey building being located within the existing commercial area directly adjacent the grass runway.

However, this proposal is somewhat unique in that it is the aerodrome operators themselves that are proposing the development adjacent to the operating airfield and airstrip. Limited technical information has been submitted with regards aircraft safety, other than to reiterate that all the proposed development would accord with the required safety requirements in terms of heights and location of buildings. It appears that the intention is to ensure that light aircraft could safely land, without any adjacent buildings impeding their take-off or landing

vectors through the creation of general turbulence and of course due to the appropriate proximity of buildings to the runway in general safety terms.

However, it should be noted that the applicant is suggesting repositioning the landing strip some 50 metres to the south east. As the various height vectors emanate from the landing strip, it follows that provided the landing strip is repositioned as suggested, then the proposed buildings located adjacent to the landing areas would be unlikely to affect aircraft safety.

The Civil Aviation Authority (CAA) has been consulted, but has simply indicated that the location of the development as shown on the submitted plans would be unlikely to affect aircraft safety. However, it reiterated that such safety matters should be discussed with the aerodrome, and that it is the aerodromes responsibility to ensure the safety of the airfield operations. Officers asked the CAA whether there were any minimum distances between the operating airfield and residential dwellings, but they simply reiterated that there were restrictions on heights of buildings, not distances between buildings.

In officers opinion, it would appear from the safeguarding information submitted by the applicant that the proposed development would not affect aircraft safety. Consequently, as the airfield operators are ultimately responsible for the safety of the airfield and the public, and whilst the various aircraft safety concerns are understandable, it is considered that it would be difficult to refuse the scheme subject of the application on the basis that the development was likely to harm aircraft safety, or hence, likely to harm the safety of the occupiers of any new development on the site.

Therefore, officers do not recommend that the scheme be objected to on an aircraft safety or a related public safety issue.

9.33 Impact on and from firing range facility

To the north east corner of the site, adjacent to Area C, is located an historic firing range, which once formed part of the MoD airfield use, but is now in separate usage by a civilian pistol group. The range is currently located away from existing dwellings, separated by field systems and part of the airfield land. Third party objections have been raised from users of this facility, indicating that should Area C be approved as suggested, then it is likely there would be future noise disturbance to the proposed dwellings, which may ultimately lead to the firing range being shut down.

Officers requested that the size of Area C be reduced, so that new housing would be located away from the firing operations. Such an adjustment also has synergies with other issues. However, the applicants have undertaken a noise assessment, and maintained that subject to conditions, the relationship between the firing range and Area C would not be problematical.

As indicated above, the Council's Public protection believe that this matter can be resolved via appropriate planning conditions. This issue does not therefore form part of the suggested reasons for refusal.

9.34 Construction Impacts

Notwithstanding the above, the submitted EIA covers the mitigation required to protect neighbouring amenity, and a construction management plan can be conditioned, which should help reduce the impact of construction works on the existing occupiers and users of surrounding properties and the road system. However, it is likely that regardless of any mitigation, general construction works will be likely to lead to a reduction in local residential amenity whilst construction works are carried out, and this could be for a number of years.

9.35 General amenity impacts of new dwellings

Residents of Ford

The current residents of Ford are likely to suffer the most significant reduction in residential amenity. The proposed development of Area C surrounds these properties to the north, and the new dwellings would be accessed via Roman Road. Whilst the development of Area C is considered acceptable in principle by CP25, the quantum of development being currently proposed indicates that a number of the dwellings would be located in close proximity to existing dwellings in Ford. Given the elevated nature of part of the site, it is therefore likely that the open aspect and high level of privacy many of the residents currently enjoy over the airfield land would completely alter in character, to a more suburban appearance. However, as the design of the scheme is not a matter for consideration at this stage, a refusal based on a loss of amenity may be difficult to justify at the appeal.

Existing Dwellings around the Portway

These are likely to be similarly affected during construction, and particularly during the construction of the roundabout. Following construction and building out of the scheme, it is officers opinion that the occupiers of this dwelling would suffer from increased road and traffic noise, together with a general impact on their aspect and outlook to the east, which at the current time is of a rural character, albeit somewhat affected by the busy A345 road. However, given that the principle of development on Area A is considered acceptable, and as the design of the scheme is not a matter for consideration at this stage, a refusal based on a loss of amenity may be difficult to justify at the appeal.

9.36 Vibration issues

Over the last few years, there has been an issue related to an ongoing industrial operation and the creation of vibration emanating from one of the adjacent industrial units on the Old Sarum business Park. A number of existing properties on the existing Old Sarum site have apparently experienced this vibration. The noise emanated from the Equinox building as was due to the cutting of sheet steel.

The Council's Public Protection officers original raised concerns regards this matter and its likely impact on the planned new housing. However, since the application was submitted, this issue has resolved itself. Equinox have since vacated the building, and the building is now occupied by more benign industrial uses. Consequently, this is no longer an issue in relation to amenity.

9.4 Highways and parking issues

The scheme proposes new access points onto the Portway to serve Area A, and a new access onto the C Class Roman Road, to serve Area C. The proposal also suggests works within the site and within the highway along the Roman Road to improve highway safety/traffic calming works, as outlined below:

- Internal circular footway / cycle path within the site boundary providing a traffic free route for pedestrians and cyclist for around 700metres along the Airfield frontage onto the Ford Road
- Footway connection between Parcel C access and Merrifield Close along Ford Road;
- Traffic and environmental management measures to improve Ford Road. Measures could include:
 - Extend 30 mph speed limit;
 - Introduction of a Gateway Feature in to assist with reducing traffic speeds;
 - Introduction of priority working at locations to keep speeds low;
 - Investigate options for improvements to the bridge crossing over the River Bourne;
 - Improved pedestrian and cycle links at the Portway;
 - Investigate provision of a formal crossing point over the Ford Road to connect to the South and some road widening

Concerns have been raised regards the highways impacts of the development by many third parties, particularly with regards the likely impact of the scheme on the narrow Roman Road which serves Ford and the immediate area, which is of a pleasant rural character, but already used as an alternative route by local traffic between the A345 and the A30 London Road and A338, and is described by many third parties as a “rat run”. The road also serves as part of the National cycle route through the Salisbury area.

Paragraph 32 of the NPPF indicates that:

“32. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for*

major transport infrastructure;

- *safe and suitable access to the site can be achieved for all people; and*
- *improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”*

(Members should note that the NPPF does not define what “severe” means in a highways context. However, a recent appeal Inspector’s decision indicates that:

“.....36 - I note that the third bullet point at paragraph 32 of the Framework (NPPF) states that development should only be refused on highway grounds where the cumulative residual impact would be severe. There is no definition of the word severe in the Framework but that is clearly an extremely high bar. However, it appears to me that paragraph 32 of the Framework in that regard is referring to matters of highway capacity and congestion, as opposed to matters of highway safety. The Courts have held that paragraph 32 should not be interpreted to mean that anything other than a severe impact on highway safety would be acceptable and I have viewed the paragraph in that context.

The Inspector cites relevant case law (Mayowa-Emmanuel v Royal Borough of Greenwich) which indicates that:

“..29 In my judgment, paragraph 32 of the National Planning Policy Framework that the Claimant relies on under this ground 2 is addressing matters of highway capacity and congestion. It is not concerned with highway safety considerations in themselves. It cannot be, because it cannot be the case that the Government considers anything other than severe impact on highway safety would be acceptable, which would be the implication of the Claimant’s argument.”

Given the above, whilst the Council still has a responsibility to demonstrate ‘severity’ in issues relating to capacity, it would appear that test is not required when considering safety matters.)

Notwithstanding the NPPF, CP57 of the WCS deals with the general impacts of a development, linking to CP61 of the WCS, which deals with the highway impacts of a proposal. Similarly, policies 62-66 also relate to the highway related impacts of the proposal.

Core Policy 61 (Transport and New Development) of the WCS indicates that:

“New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives.

As part of a required transport assessment, the following must be demonstrated:

- That consideration has been given to the needs of all transport users (where relevant) according to the following hierarchy:*
 - Visually impaired and other disabled people*
 - Pedestrians*
 - Cyclists.*
 - Public transport.*
 - Goods vehicles.*

f. Powered two-wheelers.

g. Private cars.

ii. That the proposal is capable of being served by safe access to the highway network

iii. That fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development. Where appropriate, contributions will be sought towards sustainable transport improvements and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.”

9.41 Current situation

A detailed Transport Assessment has been submitted with the application, which indicates that whilst traffic in the surrounding area would be increased, subject to mitigating works and contributions, the impact of the scheme in highways terms would be acceptable. The scheme includes suggested traffic calming measures along the Roman Road through Ford, as well as a new vehicular access off that road. Two other road accesses off the Portway are also proposed. Significant numbers of parking spaces are shown within the scheme.

As stated, this application is in Outline form only. However, the only matter to be considered in detail for the proposed scheme are two access points into Area A & B, and the access to Area C, including some suggested works to the Roman Road.

The Council's Highways officer has indicated that:

“...Areas A and B

I am satisfied that the arrangements for the development of Areas A and B (and subject to the access modifications shown on WSP drg SK102C) are, satisfactory. However, I have had no response to issues raised on the points raised in the Masterplan –

- *There is an opportunity to create a better entrance from the Portway, that will give a better presence to the airfield entrance and reduce interaction with industrial estate users and the housing to the north.*
- *The airfield owners are in discussion with the owner of the entrance to the airfield to enable improvements to be put in place*

And in relation to Green Lane;

- *It is proposed that use will be restricted to bicycles, maintenance vehicles and public transport.*

This needs further discussion.

I have also had no response to concerns about the ability to provide acceptable footway facilities on Roman Road (shown on sketch drawings submitted), related to concerns I have with the potential conflict between pedestrian movements generated by the site with the additional traffic generated by Area C of the site (and which require detailed consideration of boundary features, apparently affected by proposed work on existing roadside verges).

I do not consider there to be reasons on transport grounds to refuse these elements of the application, and would seek the a planning agreement to secure local transport improvements identified in the Salisbury Transport Strategy, principally to support existing non-commercial bus services in the area...”

Thus, in terms of revised areas A & B, subject to a suitable S106 to secure financial support towards non-commercial bus services in the area, the highways officer would have no objection. However, with regards Area C, he offers the following:

“Area C

This aspect of the development is of concern from a highways and transport consideration.

Whilst the access arrangements proposed are satisfactory from a technical point of view, I am concerned that the arrangements set out in the supplementary submission by WSP (Dec 2015), to accommodate separation of pedestrians from traffic on the carriageway in the vicinity of Ford Road between the proposed site access and Green Lane are not achievable within highway land to an acceptable standard of provision.

The additional potential conflicts of traffic and pedestrians in this area, and along other stretches of Ford Road, where few facilities for pedestrians exist, present a potential safety hazard which remains unaddressed.

The nature of Ford Road, especially to the east of Green Lane, is characteristic of a rural lane, which is subject to levels of traffic which cause damage to carriageway haunches and roadside verges. The intensification of traffic associated with the development on the lane will likely lead to further deterioration.

The terminal junction of Ford Road with the A338 near the Church Road roundabout, and the junction of Old Castle Road with the A345 (catering for east Salisbury and Amesbury bound traffic respectively) are both sub-standard in relation to contemporary junction standards, with visibility being constrained at both. Intensification of use of these junctions is undesirable and could result in an increase in the collision records recorded at these junctions. Ford Road and Old Castle Road junction is constrained in width, and difficult for two vehicles simultaneously passing through the junction.

The level of public transport provision serving the Ford Road is very limited, and not at a level where it can be relied upon to provide a realistic alternative to travel by car mode. The existing service provide for school trips, but other than that they are extremely limited. We therefore have major concerns about the development in Ford on the south side of the runway for the following reasons:

- *Bus services through Ford are limited to two buses per day (off-peak) plus school buses. Area C is not within easy walking distance of any regular bus route.*
- *It does not appear that there will be any facility for buses to be able to penetrate and turn round in the new estate in Ford. Therefore buses would have to pick up and set down passengers on main East-West road through Ford (Ford Lane) but this has no pavement of any length along it, nor bus stops on the westbound side of the road.*
- *The lack of safe bus stops on Ford Lane would present a major problem for students on school buses needing to alight near the new estate as most would need to be transported to schools some distance away.*
- *It might be possible to resolve some of the bus stop concerns if a road link could be made from Manor Farm Road into the new estate, as buses would then be able to operate a loop around the old and new estates using Merrifield Road.*

- *If an improved bus service was provided along Ford Lane there would need to be funding for this and provision of tarmacked bus stop waiting areas and footways leading from them to the development.*
- *If no primary schools were going to be provided on any of the three sites, it is likely that school transport would need to be provided to schools in surrounding villages such as Winterbourne Earls, Stratford sub Castle and Laverstock. This is because the primary school at Old Sarum is full and there would be no safe walking route to any other school (including Longhedge). Assume an additional cost to Wiltshire Council of £40,000 per annum for this.*
- *Transport would also be needed from the site to Laverstock Schools - again assume an estimated cost of £40,000 for this.*

Members will need consider whether these identified deficiencies in the local road network are such that the development proposed at Area C would provide for opportunities for sustainable transport modes being taken up, that safe and suitable access to the site can be achieved for all people, and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development; proposals should not be refused on transport grounds unless the residual cumulative impacts of development are severe. These are the tests which the NPPF (paragraph 32) requires are met. (NB the Courts have now clarified as noted above that the severity test does not apply to highway safety considerations)

The balance in this case suggests that an objection to the Area C development should be considered.....”

As a consequence of the above comments, officers are advising that:

- i) Until a suitable S106 agreement has been provided which secures a suitable contribution to enhance the local non-commercial bus operation, then an objection remains regards the impact of Areas A & B on the highway system, and
- ii) At the time of writing, concern still exists regards the impact of Area C in highway and pedestrian safety terms. The lack of a bus contribution to mitigate future deficiencies as a result of the development is also of concern.

Consequently, officers have recommended a refusal reason regards highway safety and the lack of a S106 and thus the provision towards sustainable transport mitigation.

9.42 Impact of the scheme on A36 road system

Notwithstanding the above, Highways England (formerly the Highways Agency), has had lengthy discussions with the applicant during the application process, regarding the impact of the development on the A36 Trunk road system around the edge of Salisbury. To this end, a capacity assessment has been undertaken with regards the impact of the development on St Pauls Roundabout, Castle Roundabout, and St Marks Roundabout which are located along the northern part of the ring road system to the north of the city centre.

The assessments have indicated that the impact of additional traffic from the development in combination with existing traffic will result in a “severe” impact on the road system, in terms of exacerbating existing queuing and delays.

Consequently, the HE has stated that in its opinion, the proposal would be acceptable subject to a financial contribution of £500,000. This contribution would be required to mitigate the impact of the increased traffic at this junction, and would be used to modernise the existing traffic light system at this roundabout, effectively making it more intelligent and responsive to enable better management of the traffic. The new system would improve the efficiency of the system and reduce delays.

Highways England have therefore suggested that the scheme is now acceptable in terms of its impact on the A36, subject to a condition securing the works to the Castle Roundabout, and a condition related to travel plans and sustainable travel. Whilst a condition related to travel planning can be achieved, the securing of a defined quantum of financial contribution can only be secured via a legal agreement. (If a condition is used, it may ultimately be that the works to the roundabout may end of costing either less or more than the current defined sum. This in turn may affect the viability of the scheme).

Consequently, whilst the applicants have accepted the need for this mitigation and have in principle agreed to provide the financial contribution, a S106 agreement is not yet in place which secures such a payment or mitigation. Until that point in time, officers have to recommend that the lack of such agreement must form part of any reasons for refusal.

9.43 Impact on Green Lane right of way

The development areas are located adjacent to Green Lane, a well used right of way leading southwards through Ford and on to the Bishopdown Area. A small part of the right of way off the Portway and in Ford is also used to access a number of dwellings, but the remainder is solely used by non vehicular traffic and has in the most part a rural green character to it. Where substantial new development has occurred adjacent to green Lane in the Bishopdown area, existing planting and mature trees adjacent the right of way have been retained and improved.

Whilst some of the supporting literature submitted with the application indicates that Green Lane may be affected by the development in terms of needing upgrading, it is understood that the applicant has clarified that Green Lane would be retained as it is and therefore unaffected by any additional works. Area C would have a separate vehicular access onto Ford road, although pedestrian and cycle access to Green Lane is suggested at a few points. As part of Area B, one of the hangers would be located adjacent to Green Lane, but would not impact on it considerably.

Thus in highway terms, officers are advising that there is no grounds for refusal of the scheme in terms of the impact on Green Lane.

9.44 Linkage to surrounding development and areas

The proposals includes footpath/cycle linkage within the site to the existing Ford settlement, including a pathway linkage to the Roman Road to the south, with the intention that the

scheme would allow future linkage with and access to the emerging country park which is being built out to the south of Roman Road.

Such linkage is considered desirable, and is welcomed. It would also allow all residents to share the various facilities and services offered in the surrounding area, including the open space, schools, and any other community facilities which may develop over time. In particular, it would offer access to the planned community land and to the wider countryside via the footpath network. Such a link would in officers opinion, offer benefits to the future residents of the scheme, as well as to existing residents of the both the Old Sarum and Hampton Park residential areas. Whilst it is noted that a similar linkage already exists via Green Lane, linking Ford and Old Sarum residential areas with the edges of the city, this linkage is some distance to the south, and a northern linkage would allow easier access to the emerging Country Park facilities and the adjacent school.

However, such linkages will need to be secured via any S106 agreement, as public access will need to be secured in perpetuity, and they may need to be built out to adoptable standards, and this may be affected by the different legal ownerships of the application site.

At this point in time, not such agreement exists, and therefore the linkages and any benefits have not yet been secured. Consequently, at the present time, until such agreement is reached, the proposal would not secure such community gains, and thus, be contrary to the aims of CP25. Officers have therefore recommended a refusal reason on this basis.

9.5 Ecology and biodiversity

Paragraph 118 of the NPPF indicates clearly that:

“118. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;*
- *opportunities to incorporate biodiversity in and around developments should be encouraged;*

planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;

Similarly, Core Policy 50 (Biodiversity and geodiversity) & 52 (Green Infrastructure) are relevant, with the former stating that:

“Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.....all development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services..”

The site is located within proximity of the River Avon SSSI. Hence the area is sensitive in terms of development which may affect the water systems and drainage.

The applicants have submitted an Environmental Statement (ES) which covers the likely impacts on the ecology and water systems. This concludes that there is unlikely to be significant impacts. It does not appear that the general site contains any significant biodiversity or protected species.

However, the application site directly abuts Green Lane to the east, with open countryside to the north and the planned Country Park to the south. With this context in mind, the Council's ecologist has commented thus:

“...The Council has not completed an assessment for this application under section 61 of the Habitats Regulations 2010 (as amended) and this will therefore be the responsibility of the Inspector who will become Competent Authority under Regulation 61(1). Since the Council Ecologists consultation response of 16 May 2016, the principles underpinning the Nutrient Management Plan for the River Avon SAC have been under scrutiny. The Council has prepared its own model to demonstrate the effects of current and proposed development throughout the Hampshire Avon catchment and this is currently being finalised with advice from specialists at the EA and Natural England. Once approved, it is expected that the Council's model will support the Council's Housing Site Allocations Plan through EiP in 2018. Currently the model takes account of strategic allocations identified in the Wiltshire Core Strategy 2006-2026 and the Wiltshire Housing Site Allocations Plan (pre-submission draft June 2017) and the inspector will need to determine at the time of making a decision, the extent to which the model accommodates the 462 dwellings proposed by the Old Sarum application. As the model is currently incomplete, the Council recommends that advice is sought from Natural England and the EA on the approach to be taken in the assessment.

Insufficient information has been submitted to demonstrate that potential bat corridors along Green Lane can be maintained in the long term. No survey information was provided in relation to this corridor and, in light of the use made by bats of Green Lane at Hampton Park II to the south, the Council assumes it forms a commuting and potential foraging route for bats at Old Sarum. The Illustrative Landscape Plan is unclear on the treatment of this boundary. In addition, the Council cannot accept that boundary features under private

control will be maintained and managed appropriately for bats in the long term as experience from other schemes demonstrates new owners often remove or degrade hedgerows. The Council has therefore requested cross sections through Green Lane to show the distance between garden boundaries and the edge of the proposed hedge (assuming this is what the Illustrative Landscape Plan proposes) along Green Lane. This needs to be a minimum of 5m wide to allow for annual growth and an acceptable access strip for maintenance.

Furthermore, the Council Ecologist is also concerned that there may be calls to erect street lighting along Green Lane in the future as it appears to be promoted in the application as a sustainable transport route. This has the potential to diminish the significance of the route for bats. The appellant should demonstrate how impacts will be avoided if future calls are made to light this route...

Whilst the applicant has previously assured the Council that there was no intention to route any traffic via Green Lane, it therefore appears that there is an outstanding issue related to protected species which needs addressing at this time. Therefore, this matter is therefore listed below as one of the reasons for refusal.

9.6 Drainage and Flooding matters

The NPPF states that:

“103. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and*
- development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.”*

Core Policy 67 of the Wiltshire Core Strategy relation to Flood Risk also indicates that:

“Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the Sequential Test in line with the requirements of national policy and established best practice. All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.”

Some concerns have been expressed by third parties that the quantum of development overall being proposed by the developers, would have an adverse impact on the existing and proposed drainage infrastructure and also exacerbate flooding issues which have occurred in recent years to part of the Ford roadway and surrounding land.

However, the Environment Agency has not raised any fundamental objections to the proposed scheme, subject to suitable conditions being imposed. Similarly, the Council's Drainage officer has raised no particular objections. Wessex Water's response suggests that

with mitigation to existing drainage services, the development would be acceptable. As a result, whilst the local objections and concerns are noted, it would be difficult to refuse the scheme subject of the application on drainage and flooding grounds.

Consequently, provided suitable planning conditions are accepted by the applicant as part of the appeal process, there is no reason for refusal regards this issue. Conditions are dealt with and agreed during the appeals process and imposed where judged necessary by the Planning Inspector if the Inspector determines that permission should be granted.

9.7 Archaeology

Third party concerns have related generally to the impact of the scheme on the heritage assets, including concerns expressed by the British Council of Archaeology. However, with regards any below-ground heritage assets, the Council's Archaeologist has commented thus:

"This site is of archaeological interest. There have been multiple phases of evaluation, both trenched and geophysical survey, since 2007, which have demonstrated that there are some areas with significant archaeological remains. The application includes an archaeological mitigation strategy which takes a strategic view with regard to the areas for preservation in situ, areas for archaeological excavation and also areas for archaeological watching brief.

The NPPF says: 141. Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

It is therefore recommended that a programme of archaeological works, which would include the future management proposals for areas that are proposed for preservation in situ, is conditioned on any planning permission."

Consequently, provided suitable planning conditions are accepted by the applicant as part of the appeal process, there is no reason for refusal regards this issue. Conditions are dealt with and agreed during the appeals process and imposed where necessary by the Planning Inspectorate.

9.8 S106 and viability

CP25 specifically refers to the need for a legal agreement in relation to noise issues, and also outlines other enhancement and benefits. These are covered elsewhere in this report.

However, as with any large development scheme, and in accordance with the NPPF and WCS policy CP3, the scheme would result in a number of impacts on surrounding infrastructure and services which would require mitigation to ensure that any development is sustainable. The following outlines those matters, and current issues in this regard:

9.81 Highways improvements

If the scheme were to be deemed acceptable, the proposal would be required to mitigate its impacts on the surrounding area. Contributions towards improving local bus services would

be required, as would the provision of significant works to Roman Road to improve highway safety.

However, whilst the applicants submitted appeal details suggests they are willing to provide such mitigation, there is no completed S106 at the moment, so such provision has yet to be secured. It is also unclear at the moment exactly what the applicants suggested contribution of £200,000 would cover, and whether it includes a contribution towards improving bus provision.

9.82 Affordable housing provision

The Council's Affordable Housing officer has advised that the scheme would need to comply with Council housing policy of 40 percent affordable housing provision, as outlined by CP43. The applicant had originally expressed a preference to house military veterans on the site as part of any affordable housing provision.

However, at this time, the applicants have indicated that due to viability issues, the scheme is unable to provide any affordable housing whatsoever. This is obviously contrary to the Council's Core Policy 43 and the Council's Housing officer has indicated that until any viability matters are resolved which indicate otherwise, she would object to the application on grounds of non-compliance with CP43.

However, viability discussions remain un-concluded between the Council and the applicant, and officers are therefore unable to advise whether the scheme as proposed could support or provide any affordable housing. Furthermore, no formal S106 agreement securing any affordable housing has been provided by the applicant.

Consequently, at the current time, the proposal remains contrary to the aims and objectives of CP43, and in this respect, fails to deliver sustainable development.

9.83 Education provision

The Council's Education officer has previously indicated that financial contributions are required towards primary £2,583,152 and secondary £ 2,441,880, and early years educational facilities £1,012,140 to mitigate the impact of the children living in the new estate. It is suggested that the schools on the Old Sarum/Longhedge sites may benefit from some of the monies collected. This would need to be secured via the suggested revision to the S106 Agreement. These were 2016 figures, and officers have requested updated figures for 2017/2018.

However, at this time, the applicants have indicated that due to viability issues, the scheme is unable to provide any educational payments via S106 whatsoever. This is obviously contrary to the Council's Core Policy 3 and the Council's Education officer has indicated that until any viability matters are resolved which indicate otherwise, she would object to the application on non-compliance with CP3.

However, viability discussions remain un-concluded between the Council and the applicant, and officers are therefore unable to advise whether the scheme as proposed could support or provide any educational payment. Furthermore, no formal S106 agreement securing any educational contributions has been provided by the applicant.

Consequently, at the current time, the proposal remains contrary to the aims and objectives of CP3. A S106 payment is required and justified in this instance as any such payment is required to mitigate the specific impacts of the scheme in the immediate area around the site. It is neither sustainable development nor acceptable if the costs of the provision of education facilities for the children living on this development had to be picked up by the local taxpayer.

9.84 Open Space and other facilities

As stated elsewhere in this report, a substantial area of open space is being proposed, which includes play areas, informal seating/picnic areas, footpaths and cycleways, together with interpretation boards. However, these will need to be secured via a S106, including the future maintenance of such areas, and public access. Consequently, at the current time, without a suitable S106, officers are recommending that this form part of any reasons for refusal. It is unclear whether the applicant's provisional costs for these areas include the long term maintenance of such areas.

9.85 Waste and Recycling

The Council's waste and recycling officer is happy with the provision being offered by the developer, subject to such provision being secured via a suitably legal agreement. The contribution being requested was £43,358. Officers will seek clarification for the appeal regards whether this figure needs updating.

9.86 Public Art

In accordance with saved policy D8 and policy CP57 of the WCS, the scheme should provide funding for public art projects. Hence, this provision would be secured via a S106 Agreement. Public art projects are normally costed at approximately £300 per dwelling and £3 per/sq m of non-residential/commercial land.

9.87 Viability issues and the applicant's current position

Central Government planning policies have in recent years allowed the viability of a scheme to be taken into account. Generally, the guidance indicates that Local Authorities should seek only appropriate financial contributions and other S106 provisions, and should be flexible in terms of which such provisions are requested of a developer. The NPPG indicates that:

"...In making decisions, the local planning authority will need to understand the impact of planning obligations on the proposal. Where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations.

This is particularly relevant for affordable housing contributions which are often the largest single item sought on housing developments. These contributions should not be sought without regard to individual scheme viability. The financial viability of the individual scheme should be carefully considered in line with the principles in this guidance.."

The applicant's viability scheme has been the subject of protracted discussions between the applicant and Council officers over many months, and the Council has also taken advice

from independent sources. At the current time, no agreement has been reached between the parties, and thus officers are unable to confirm whether the scheme would be viable enough to provide any, some, or all of the provisions outlined above. At the present time, according to the applicants own appeal information, they are intending to provide the following:

Aircraft Noise

- Aircraft noise to be controlled to avoid noise at front façade of dwellings (i.e. as measured in accordance with industry standards) to be no greater than 57dB LAeq,16h with the exception of specified units which front onto the landing strip.
- The obligation to include means of monitoring aircraft noise via modelling and remedial action to be taken in the case of exceedance.
- Applicant to form an Airfield Consultative Committee with a constitution and terms of reference.

Heritage

- Applicant to deliver heritage enhancements in accordance with the Conservation Management Plan 6731 CMP Rev D17 March 2015 including refurbishment of the Applicant's Listed WW1 Hangar and other airfield heritage infrastructure pursuant to Core Policy 25. Works to hangar estimated by the applicant as being £3,000,000.
- Applicant to retain and sustain flying used of airfield in accordance with Core Policy 25.

Airstrip relocation

- Applicant to relocate runway in order to mitigate the impact of aircraft noise on existing and proposed dwellings.

Wiltshire Highways

- Highways work not covered by CIL, (The applicants submitted appeal information suggests a figure of £200,000)

Highways England - Castle Roundabout

- Applicant to deliver or make a contribution towards MOVA traffic signal upgrade scheme of £500,000

Community infrastructure

- Applicant to deliver community infrastructure including arboricultural and ecological improvements, construct viewpoints, picnic spots, cycleways and footpaths. Estimated by the applicant to cost the following:
 - Arboriculture Costs £1,000
 - Construct and equip New Viewpoints £15,000
 - Construct and equip New Picnic Areas £18,000
 - Ecology £1,000
 - Construct Footpaths £199,200
 - Construct Cycleways £770,000

Waste Storage and Collection

- Applicant to make a contribution towards waste storage and collection as set out in the Waste storage and collection: guidance for developers Supplementary Planning Document

Summary

Consequently, at this stage, until such time as the viability issues are resolved, officers must consider the scheme of being viable, and on that basis, it is necessary to provide the required infrastructure to service the development. Thus, on this basis, as it stands at present, the scheme would be contrary to the aims of policy CP3 and the NPPF, regards the provision of suitable supporting infrastructure and mitigation.

9.9 CIL payments

As referred to above, regardless of any specific S106 payments/contributions, the development would be required to provide monies as part of the separate Council CIL Charging regime. The applicant's current estimate of this payment would be approximately £4.5 million, and is therefore currently querying the requirement to provide some S106 payments on top of such monies. However, Members should note that this is only an estimate based on the current indicating outline scheme, and CIL payments are normally only calculated and charged once a more details reserved matters or full application has been determined.

However, notwithstanding, the payment of CIL is non-negotiable – it is a statutory requirement - and is not the subject of negotiation as part of this application.

10. Overall Conclusion and planning balance

National Planning guidance regarding airfields and airports generally relates to the desire to protect and enhance flying operations and the associated commercial and employment activities such uses provide, and in general terms, does not offer guidance related to permitting residential development proposed by the operators of an airfield.

Policy CP25 of the Wiltshire Core Strategy relates directly to the airfield, and in principle permits development of the identified parcels of land, but only if any scheme address the various criteria outlined in the policy. However, as the policies of the Plan must not be read in isolation, any scheme should also be tested against other policies in the Core Strategy; the statutory duties imposed by the government, and national planning guidance.

The application suggests airfield related development would be located in Area B directly to the south east of the existing airfield buildings and adjacent commercial industrial units. In general, subject to future details, the provision and enhancement of existing airfield facilities and operations is welcomed, particular where this would also enhance the overall visitor experience and provide public related community facilities, as well as enhanced employment opportunities. The provision of community facilities, open space, pathways and cycleways is also welcomed. The enhancement of the existing hangars and overall heritage asset is welcomed in principle.

However, following concerns regards the Development Masterplan and the submitted Conservation Master Plan, the outline scheme as currently presented is subject to significant concerns from various consultees and third parties, regards the harm caused to the heritage assets, particularly the character and setting of the listed hangar buildings, the Old Sarum Ancient Monument and the airfield Conservation Area.

Similarly, there remain outstanding matters and concerns regarding the likely impacts of the airfield use on the existing and proposed dwellings in terms of noise disturbance. Furthermore, the impacts of the proposed housing on the adjacent highway system remain subject of an objection from the Council's Highways officer. There remain outstanding issues in relation to the impact of the works in ecological terms. Whilst some details of design and landscaping have been submitted, at the time of writing, these details remain in outline form and are subject to future change. Given the continued concerns, the Council therefore remains concerned that the scheme as put forward cannot achieve sufficient high quality design or strategic landscaping to help mitigate the impacts of existing development or enhance the historic environment.

Whilst it appears that the current application scheme may provide some community benefits as outlined in the report above, at the time of writing, no firm legally binding S106 has been provided which would ensure such provisions. Similarly, without such a legal agreement, the Council cannot be assured that the proposals would be able to retain and safeguard flying activity, or would be able to provide reasonable controls over flying activity, protect the amenities of existing and future residents, provide a long term strategy for enhancements of the historic environment including the securing of public access and provision of interpretation materials.

Notwithstanding the above, at the time of writing, there is also an outstanding issue related to the viability of the scheme and its ability to mitigate the impacts of the scheme in terms of affordable housing provision and the mitigation of the educational impacts of the proposals. Whilst the suggested repairs and enhancement of the listed hangar is welcomed in principle, given the extent of the works to the hangar suggested by the applicants viability assessment (some £3 million) the actual extent of any works is currently unclear and thus the likely impact to the heritage asset remains unspecified.

As a consequence, based on current submissions, the current scheme would not achieve the aims of policy CP25 of the Wiltshire Core Strategy, and would also fail to comply with the requirements of CP3 in terms of providing the required mitigation and infrastructure, CP43 in terms of the lack of provision of affordable housing, CP51 & 52 in terms of providing high quality strategic landscaping and biodiversity enhancements, CP57 in terms of the provision of a high quality design, CP58 in terms of the protection and enhancement of the historic assets, and CP61, in terms of the protection of the highway system. The proposal is therefore also contrary to the guidance given in the NPPF & NPPG regards good design, protection of amenity, infrastructure provision and protection, and the protection of heritage assets. It is not a sustainable development.

RECOMMENDATION: That the Planning Inspectorate be advised that the Council would have REFUSED the scheme, for the following reasons:

1. The proposal envisages a total of up to 462 dwellings, 302 on Area A which will utilise access points with the Portway, and 160 dwellings in Area C, utilising a new access onto the "C" Class Roman Road, as well as the additional facilities in Area B. Traffic calming measures and road improvements are suggested along the Roman Road adjacent Area C.

The development of Areas A & B are considered to be acceptable in highways terms subject to the enhancement of the local bus services. However, Area C, would have a vehicular access onto Ford Road, which is a relatively narrow rural lane which serves the local community and a degree of non-access through traffic. The lane has no footways to provide for safe pedestrian movement between upper and lower Ford areas, or to facilities in Castle Road and beyond; a greater intensity of conflict between increased vehicular and pedestrian and cycle movements on this road would present a higher and unacceptable safety risk.

Local bus services convenient to the site are very limited; this, together with the potential perceived threats to local pedestrian and cycle movement on Ford Road demonstrates the site does not have adequate sustainable transport facilities to provide a real or acceptable choice to future residents. The width of Ford Road is generally narrower than would be required within the development site; the resultant increase in traffic movements on the road will add an unacceptable level of conflict and inconvenience to existing users.

Whilst the applicant has agreed in principle to a financial contribution related to a scheme of highway improvements along the Roman Road, it is unclear whether this will mitigate against all highway impacts including improving the local bus services.

Given current outstanding viability issues, such mitigation may not be forthcoming. Furthermore, at the time of writing, no formal S106 exists which would secure this mitigation. Consequently, in the absence of such a legal agreement which secures the required mitigation, the Local Planning Authority must assert that the scheme as proposed would be likely to have a significant impact on the wider highway system

The proposal would therefore be contrary to the aims of the Local Transport Plan, and adopted policies CP60-64 of the Wiltshire Core Strategy, as well as the guidance within the NPPF.

2. Notwithstanding the impact on the road system immediately around the site, Highways England has recommended that the application is acceptable, in terms of the impact on the trunk road network, subject to the implementation of an enhanced traffic management scheme, which would improve the issues surrounding the impact of traffic from the development on the wider network, in particular in relation to how the impact of additional traffic would exacerbate existing congestion issues at the existing junction between Castle Road and the A36 trunk road.

Whilst the applicant has agreed in principle to a financial contribution to such a scheme of £500,000, at the time of writing, no formal S106 exists which would secure this mitigation. Consequently, in the absence of such a legal agreement, the Local Planning Authority must assert that the scheme as proposed would be likely to have a significant impact on the wider highway system, particularly the A345 Castle Road

and its junction with the A36 Trunk Road at Castle Roundabout. The proposal is therefore contrary to the aims of the Local Transport Plan, and adopted policies CP60-64 of the Wiltshire Core Strategy, as well as the guidance within the NPPF.

3. The proposals would be located adjacent to a working airfield and airstrip. A primary reason for the inclusion of Policy CP25 within the adopted Wiltshire Core Strategy is to secure a scheme to reduce historic noise and disturbance emanating from the use of the airfield. Notwithstanding this matter, the housing proposal sites Areas A & C would be located closer to the operating airfield than existing dwellings in the surrounding area. Several of the dwellings planned within Areas A & C would, in the opinion of the Council, be likely to suffer noise disturbance from the operation of the airfield.

Notwithstanding, in recent months the applicant has apparently increased flying activities at the airfield, including the introduction of helicopter training flights. This has resulted in additional complaints to the Council regards noise disturbance, and it is unclear whether these additional flights have been included in any updated noise assessment. It is also understood that these additional training flights would need to continue for the foreseeable future, due to contractual arrangements.

In addition, it is understood from viability discussions that the number of flights that would be needed to attain the viability the applicants seek would need to be above 50,000 a year. This raises the issue of whether, at this sort of scale of operation, the aim of achieving reduced noise disturbance can be realistically achieved.

Whilst the applicant has offered in principle to agree to restrictions and limitation on the operation of the airfield, at the time of writing, no binding S106 legal agreement has been entered into, and therefore it is not clear what measures the Council could reasonably impose on the airfield operations which would reduce the impact of the operations on existing and future residential amenity, and whether such restrictions would in any event adversely affect the long term viability of the airfield.

Consequently, in the absence of such a legal agreement which would achieve reasonable noise controls whilst maintaining the flying operations, the current proposal would be likely to have an adverse on existing and future residential amenity, contrary to the aims of policy CP25, and policy CP57 of the Wiltshire Core Strategy, and the guidance provided in the NPPF and the NPPG, and associated Aviation guidance, regards amenity and noise disturbance, and maintaining airfield operations.

4. The proposal is located within close proximity to and within the setting of the Old Sarum Scheduled Ancient Monument and its surrounding Conservation Area, and is located within the Conservation Area encompassing the Old Sarum Aerodrome, which itself contains several listed hangar buildings. The site currently has an open character.

The proposal is in outline form, with only access being a detailed matter, but the number of dwellings being fixed. The applicants own visual assessments and other graphical information suggest that the residential development on Areas A & C would be readily visible from the Old Sarum Ancient Monument, with Area C likely also to

be visible above the ridge line. The applicant's submitted information shows only a small area of landscaping, and to achieve the number of dwellings indicated on Area A, the indicative plans suggest the need to build up to three and four stories across much of the site, with some properties requiring under-croft parking arrangements.

Thus, the development of Area A as suggested with the number of dwellings proposed would be highly prominent and intrusive in the landscape. Whilst some form of development of Area B is acceptable in principle by CP25, the details of the buildings and uses within this area are rather sketchy and it is unclear how tall these buildings would be, or how they would relate to the adjacent development or surrounding open land, or how visible they would be within the surrounding area. Furthermore, whilst the illustrative material for Area C shows a scheme likely to be more sympathetic in scale to the area, without a reduction in the number of dwellings in this Area and/or detailed design treatments to ground levels and roof designs, it does appear that the northernmost edge of this scheme would be visible across the airfield and would be likely to visually amalgamate with the development of Area A and B as seen from higher land to the south, including the Old Sarum Monument.

Consequently, unless the quantum of development is clarified and reduced, it is considered that the scheme as proposed would have a significant visual impact and be likely to cause substantial harm, to the character and setting of the surrounding heritage assets, including the historic landscape of Conservation Area surrounding the Old Sarum Monument, and the airfield Conservation Area itself. The proposal would therefore be contrary to the aims of policy CP25 and CP58 of the Wiltshire Core Strategy, and the guidance given in the NPPF, and sections 66 and 72 of Town and Country Planning (Listed Building and Conservation Areas) Act 1990.

5. Notwithstanding the heritage issues related to Areas A, B & C, the application suggests that enhancement works would be undertaken to the heritage assets currently present within the airfield site, including the listed hangars. Whilst such a commitment is welcomed, it is currently unclear exactly what such enhancement works would entail and to which structures. Consequently, and in the absence of a suitable legal agreement to secure such works, it is considered that proposal would therefore be contrary to the aims of policy CP3, CP25 and CP58 of the Wiltshire Core Strategy, and the guidance given in the NPPF, and sections 66 and 72 of Town and Country Planning (Listed Building and Conservation Areas) Act 1990.

6. The application scheme suggests the provision of a large area of public open space, including pathways and cycleways, picnic areas, and interpretation information. The applicant has also confirmed the proposal would mitigate its impacts with respect to waste and recycling matters.

However, at the current time, the applicant's viability assessment suggests that no mitigation is able to be offered in respect of the on-site provision of affordable housing, or towards mitigating the off-site impacts of the development in terms of educational provision, and does not make provision for public art.

Consequently, in the absence of a suitable legal agreement to secure such mitigation, it is considered that the proposal would not be sustainable development

and would be contrary to the aims of policy 6 of the Wiltshire Waste Core Strategy, policies CP3, CP25, CP43, CP57, and CP61- 64 of the Wiltshire Core Strategy, including saved policy D8 and R2, and the guidance given in the NPPF regarding planning obligations and the provision of sustainable development which mitigates its impacts.

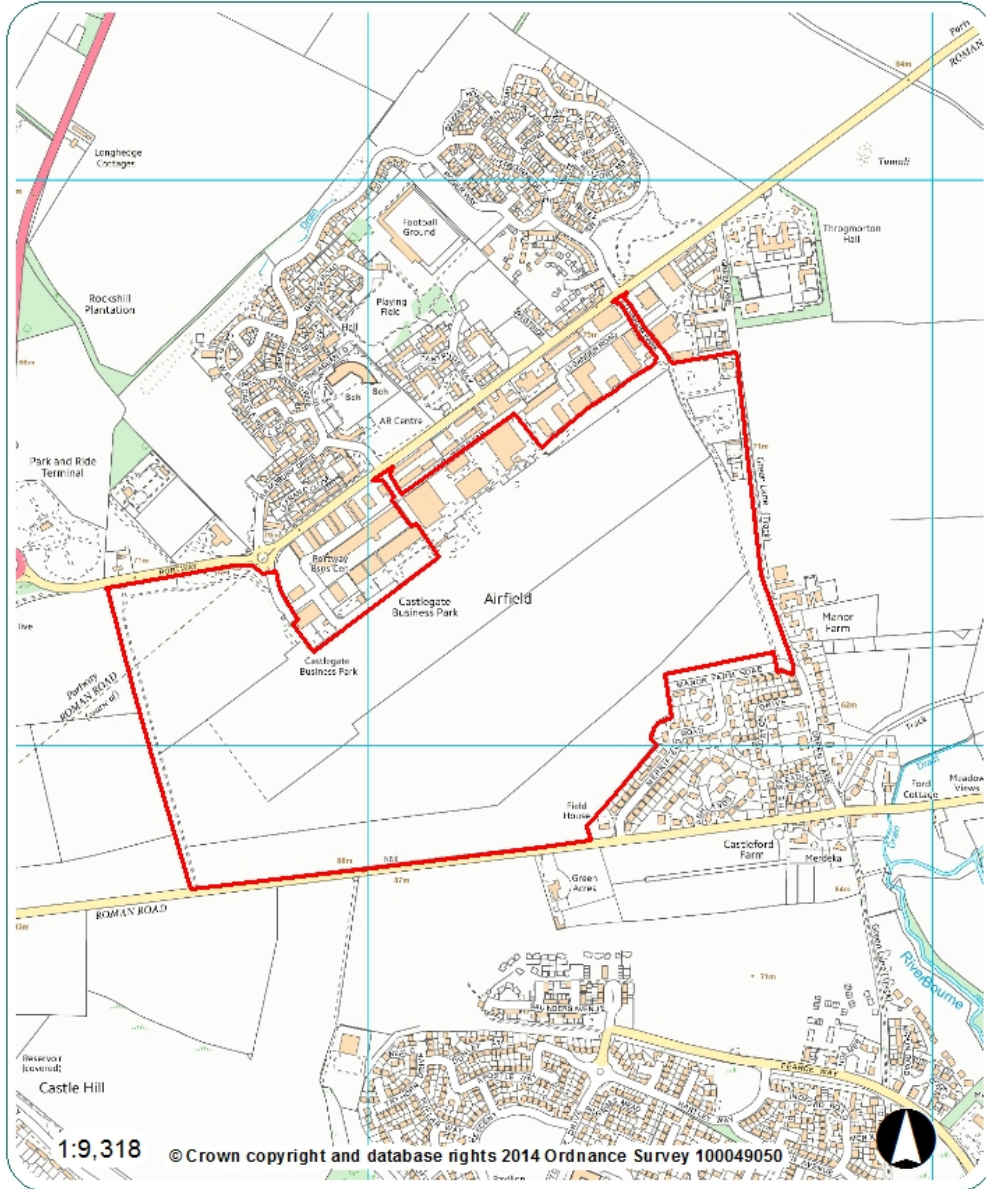
7. The application site abuts Green Lane, a right of way running to the north east of the airfield perimeter. Insufficient information has been submitted to demonstrate that potential bat corridors along Green Lane can be maintained in the long term. No survey information was provided in relation to this corridor and, in light of the use made by bats of Green Lane at Hampton Park II to the south, the Council assumes it forms a commuting and potential foraging route for bats at Old Sarum. The Illustrative Landscape Plan is unclear on the treatment of this boundary. In addition, the Council remains to be convinced that boundary features under private control and located so close to adjacent dwellings will be maintained and managed appropriately for bats in the long term as experience from other schemes demonstrates new owners often remove or degrade hedgerows.

Additionally, Green Lane appears to be promoted in some of the application literature as a sustainable transport route. This has the potential to diminish the significance of the route for bats. The appellant has yet to demonstrate how such impacts will be avoided if there is future pressure from users to light this route.

Consequently, in the absence of information to the contrary, the proposal would be likely to have an adverse impact on protected species and the River Avon Special Area of Conservation, contrary to the aims of policies CP50 & 52 of the Wiltshire Core Strategy and the guidance provided by the NPPF regards biodiversity and habitat management.

This page is intentionally left blank

15/04004/OUT
Old Sarum Airfield Limited
Lancaster Road
Old Sarum
Salisbury
SP4 6DZ



This page is intentionally left blank

REPORT TO THE STRATEGIC PLANNING COMMITTEE

Report No.

Date of Meeting	31 January 2018
Application Number	17/09248/VAR
Site Address	Land East of Spa Road, Melksham, Wiltshire
Proposal	Variation of Condition 32 of 14/10461/OUT relating to site access.
Applicant	Mr Andy Birch
Town/Parish Council	MELKSHAM (TOWN)
Electoral Division	MELKSHAM SOUTH – Cllr Hubbard
Grid Ref	391595 163167
Type of application	Full Planning
Case Officer	David Cox

Reason for the application being considered by Committee

Cllr Jon Hubbard requested that should officers be minded to approve this application, it should be brought before the elected members to consider the environmental/highway impact and the relationship with adjoining properties.

This variation application relates to an application which was reported to and determined by the Strategic Planning Committee on 10 February 2016 and officers consider it is appropriate to report this application back to the strategic committee following receipt of the ward member call-in.

1. Purpose of Report

Having assessed the merits of the proposed development and tested it against the policies of the development plan and other material considerations, officers recommend that the application should be approved subject to conditions.

2. Report Summary

The main issues to consider are:

- Principle
- Access and highways
- Impact upon neighbouring amenity
- Impact on the character and appearance of the area
- Impact on designated heritage assets
- Other issues

3. Site Description

The site is known as Land East of Spa Road, Melksham. The site is approximately 20 hectares in size and forms a parcel of agricultural land to the east of Snowberry Lane. It lies between the new East Melksham Clackers Brook development, Melksham Oak Secondary School and the new playing pitches for Melksham Football & Rugby Club.

The site is relatively flat and comprises agricultural land of pasture and semi improved grassland used for cattle grazing. The fields are defined by existing hedgerows and there are few mature trees.

A public right of way runs through the site (MELW18) which provides a link from Bowerhill to Melksham via The Spa and the Clackers Brook development.

4. Planning History

14/10461/OUT - Outline application for up to 450 dwellings with associated access and engineering operations, land for extension of medical facilities or community facility, and extension to Eastern Relief Road from Thyme Road to The Spa - Snowberry Lane (amended). This outline application including the provision of an external access was approved by the Strategic Committee on 10 February 2016 subject to the signing of a S106 agreement. The legal agreement was sealed and the decision to approve outline planning permission was issued on 22 September 2016.

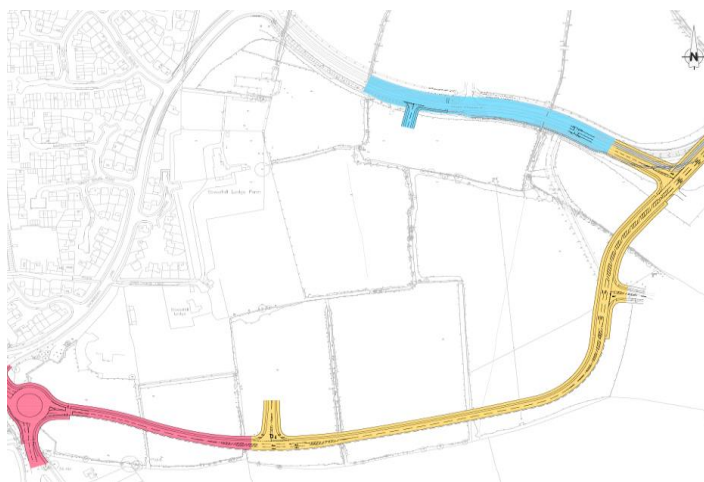
The applicant has until 22 September 2019 to submit reserved matters application(s) for a minimum of 300 dwellings as per condition 3.

5. The Proposal

This application seeks to vary condition 32 of consented application 14/10461/OUT which lists the 2016 approved plan drawings to allow the proposed northern vehicular site access located along Thyme Road, to be relocated approximately 150 metres further to the west. The variation proposal also includes removing the second internal access road into the proposed development site. These proposed variations are illustrated on the insert plans below.



Extant Approved Plan – Showing Access off Thyme Rd (ref 14/10461/OUT)



Variation Plan – Showing Proposed new Access off Thyme Rd and removal of 2nd southern access

6. Local Planning Policy

The following Wiltshire Core Strategy (WCS) Core Policies (CP) are relevant when assessing this application. CP1 (Settlement strategy), CP2 (Delivery strategy), CP3 (Infrastructure requirements),

CP15 (Melksham Area Strategy), CP41 (Sustainable construction and low carbon energy), CP43 (Providing affordable homes), CP45 (Meeting Wiltshire's housing needs), CP46 (Meeting the needs of Wiltshire's vulnerable and older people), CP50 (Biodiversity and geodiversity), CP51 (Landscape), CP52 (Green Infrastructure), CP55 (Air Quality), CP56 (Contaminated Land), CP57 (Ensuring high quality design and place shaping), CP58 (Ensuring conservation of the historic environment), CP60 (Sustainable Transport), CP61 (Transport and Development), CP62 (Development impacts on the transport network), CP64 (Demand Management), CP67 (Flood Risk)

Wiltshire Waste Core Strategy - WCS6 (Waste Audit)

When adopting the WCS, some policies continue in force from the West Wiltshire District Local Plan (1st Alteration) (WWDLP) were saved. Those which are relevant to this application include: U1a (Foul Drainage/sewerage treatment), I2 (Arts), I3 (Access for everyone).

The West Wiltshire Leisure and Recreation Development Plan Document (WWL&R DPD)

The Emerging Melksham Neighbourhood Plan

Open Space Provision in New Housing Developments – A Guide (Supplementary Planning Guidance)

Affordable Housing Supplementary Planning Guidance adopted August 2004

National Planning Policy Framework 2012 (NPPF) and National Planning Practice Guidance (NPPG)

Wiltshire Car Parking Strategy

Circular 06/2005 – Biodiversity and Geological Conservation

Planning (Listed Buildings and Conservation Areas) Act 1990

Wiltshire Council Waste Collection Guidance for New Development

Wiltshire Housing Land Supply Statement (HLSS) dated March 2017

7. Summary of Consultation Responses

Melksham Town Council – Objects: When considering the original planning application (14/10461/OUT) Councillors raised concern at the impact of construction traffic on local residents in the Snowberry Lane area and asked if *'this application were approved a condition be imposed that no construction traffic be allowed to enter the site via Snowberry Lane, but via the new relief road, which should be constructed prior to construction work taking place.'* As the relief road is not being constructed prior to construction work taking place, concern was raised that construction traffic would use Snowberry Lane, therefore Councillors **OBJECTED** to this application given the potential impact on residents in the Snowberry Lane area, with regard to noise, traffic, congestion and highway safety, particularly as Snowberry Lane is used as a walking route to Melksham Oak School.

Melksham Without Parish Council – No objection

Wiltshire Council Highways Officer – No objection

8. Publicity

The application was advertised by site notice and neighbour notification letters on 29 September 2017. Re-notification letters were sent out on 29 December 2017 following revisions made by the applicants through seeking to remove an internal access road that was originally shown to be formed towards to southern part of the site.

5 letters of objection have been received (two from the same person) raising the following summarised comments

Principle

- Where will young children play, grow and develop? An easy response would be to say that you have just built a community sports centre.

Highways

- Increase in traffic which will be a hazard to pedestrians and cause increase congestion on the main roads (A350, A365);
- The eastern relief road must be fully built prior to any building of houses;
- There should be a stipulation that the developers contribute to the cost of upgrading / increasing the capacity of the surrounding roads (not just the Eastern Relief Road), before the housing is built;
- The developers should provide a lit pathway around and through the proposed site for children attending Melksham Oak. This would keep them off the main road in the peak hours and shorten the walk for the majority of them;
- The access will cause disturbance to people opposite.
- Concern that the northern access road would be used for construction traffic.

Other Matters

- Primary Schools, Doctors and Dentists in the area are already at capacity;
- The recycling centre is full to capacity;
- There are not enough refuse bins available judging by the amount of litter in the area.

9. Planning Considerations

Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise. In this case, the Wiltshire Core Strategy, including those policies of the West Wiltshire District Plan that continue to be saved and enshrined within the WCS, constitutes the relevant development plan for the Melksham area.

9.1 Principle

9.1.1. The Principle of development has already been established by the approval of the outline application 14/10461/OUT. This permission is still extant and the developer has until 22 September 2019 to submit the first reserved matters application(s) for a minimum of 300 dwellings as per condition 3. This application seeks only to vary one detail of that outline permission i.e. changing the access into the site and only this is all that can be reasonably considered.

9.2 Access and Highways

9.2.1. The Council's Highways Officer has raised no objection to the proposed change of the northern access into the site and states that:

The provision of a simple priority junction would be in keeping with the downgraded status of Thyme Road as and when the third phase of the Eastern Relief Road has been completed. I am satisfied that the junction would operate with more than adequate capacity, and that safety would not be unacceptably compromised as a result of the provision of this junction.

9.2.2. It is therefore considered that the variation to change the access would not have any adverse impact on highway safety as the access relocation would be acceptable and there would be sufficient visibility splays in both directions. No highway based objections are raised to removing the second internal southern entrance into the site from the relief road.

9.3 Impact on Neighbouring amenity

9.3.1 The access would be approximately 30 metres away from the existing houses, which is comparable to the separation distance between the houses and the original access. There would be

no substantive material difference between the two access points and the potential effects on neighbouring amenity.

9.4 Impact on the Character and Appearance of the Area

9.4.1 The proposed variation would not have a greater impact on the character and appearance of the area compared to that which was previously approved.

9.5 Impact on Designated Heritage Assets

9.5.1 The change in the position of the northern access into the site would have no greater impact on the setting or significance of the Grade II listed Spa buildings or the Grade II* Woolmore House which are located to the south of the application site compared to the consented scheme.

9.5.2 The access would be relocated closer to Bowerhill Lodge Farmhouse which is a Grade II listed building positioned approximately 170 metres to the west. Despite being brought closer, the proposed new access off Thyme Rd would have no adverse impact to either the farmhouse setting or its significance. Future reserved matters application(s) would need to carefully appraise the impact of the intervening housing on the listed building.

9.6 Other Issues

9.6.1 Considerable concern has been raised by Melksham Town Council and from neighbour representations about this application and as part of the consultation and public notification representations, it has been argued that the eastern relief road should be built first to prevent neighbouring (and mainly) Snowberry Lane residents from the effects of construction traffic.

9.6.2. In response, these matters were raised at the time, as recorded in the published committee minutes for the 10 February 2016 meeting which recorded the following:

“Members heard the views of Cllr Jon Hubbard, the local Member, whilst generally in support of the development, did express some concerns. He drew attention to the boundary wall of 3 Farmhouse Court which was listed and should be protected. He also referred to the plan to construct an additional roundabout near the junction of Spa Road and Snowberry Lane and considered that traffic lights should be installed instead in the interests of road safety. He felt that the Eastern Relief Road should be built before commencement of building the houses rather than occupation which could then be used by the construction traffic.”

9.6.3. However, these changes were not supported by the Council’s Highways Officer; were not endorsed by the Committee and were not included as planning conditions on the permission. It would not be reasonable to impose such a requirement now, and any attempt to do so would inevitably be rejected on appeal as the Council has already accepted the principle that the road cannot be built in its entirety prior to any houses being constructed and there is no road safety argument.

9.6.4. There is no justification to restrict access to the site from Snowberry Lane. It is a road that is designed to cater for traffic of this nature and it has served the residential development sites to the north for several years and more recently, the construction of the sports facilities.

9.6.5. In the absence of a substantive planning or highway justification, it would clearly be unreasonable to impose any such condition which would fundamentally change the requirements of the permission.

9.6.6. Under the consented 14/10461/OUT application, 32 planning conditions define the terms of the permission. In addition to the standard outline and approved plan list conditions, Condition 5 requires details of a phasing scheme of the development to be submitted prior to any development on site. Conditions 26, 27, and 28 set out that various phases of the relief road which has to be

completed at certain stages of the development. Prior to the occupation of the first dwelling, the highway serving the first phase must be complete. To serve Phase 2 no more than 250 dwellings can be occupied and no more than 350 dwellings by phase 3 which would complete the new relief road. Officers furthermore submit that condition 28 imposes certainty and protection of residents that the relief road will be completed upon the 350th dwellings being occupied.

Officers recognise that there may be some disturbance to local residents whilst construction is underway. The applicant has been contacted by Officers and asked to liaise with the Division Member to explore ways in which this disturbance can be mitigated.

10. S106 Contributions

A variation would be required simply to ensure that the existing obligations entered into on the original outline planning permission are retained and honoured.

11. Conclusion (The Planning Balance)

The proposal is to vary the position of the northern access into the site which has extant outline planning permission in place to deliver up to 450 dwellings to which there are no objections in highway and /or planning terms. The variation proposal would furthermore not result in harming heritage interests, neighbouring amenity or the character and appearance of the area. There are no good grounds for refusing what is a relatively minor change to the approved scheme.

RECOMMENDATION

- 1 The development hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

- 2 No phase as referred to in Condition 5, of the development hereby permitted shall commence, other than the site access until details of the following matters for that phase (hereinafter called "the reserved matters" have been submitted to and approved in writing by the Local Planning Authority.
 - (a) The scale of the development;
 - (b) The layout of the development;
 - (c) The external appearance of the development;
 - (d) The landscaping of the site;
 - (e) The internal access arrangements
 - (f) The mix and type of housing

The development shall be carried out in accordance with the approved details.

REASON: The application was made for outline planning permission and is granted to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 and Article 5 (1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

- 3 Applications for the approval of reserved matters for a minimum of 300 dwellings shall be made to the Local Planning Authority before the expiration of three years from the date

of this permission. Applications for the approval of the reserved matters for the residual amount of dwellings (any additional dwellings in excess of 300 units) shall be made to the Local Planning Authority before the expiration of five years from the date of this permission.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990.

- 4 Development shall not be commenced on site until a supplemental planning obligation has been completed by the Council and the freehold owner of the land comprised in title number WT72400

REASON: To ensure the land is bound by the relevant covenants in the Section 106 Legal Agreement related to this permission

- 5 No development shall commence on site until a phasing scheme has been submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details.

REASON: To ensure the satisfactory delivery of the development and facilitate the proper planning of the area

- 6 No development shall commence on each relevant phase (as referred to in Condition 5) until a scheme of hard and soft landscaping for that phase has been submitted to and approved in writing by the Local Planning Authority, the details of which shall include

- * location and current canopy spread of all existing trees and hedgerows on the land;
- * full details of any to be retained, together with measures for their protection in the course of development;
- * a detailed planting specification showing all plant species, supply and planting sizes and planting densities;
- * proposed seed mix for the neutral grassland areas
- * finished levels and contours;
- * means of enclosure;
- * boundary treatments;
- * car park layouts;
- * other vehicle and pedestrian access and circulation areas;
- * all hard and soft surfacing materials;
- * minor artefacts and structures (e.g. furniture, play equipment, refuse and other storage units, signs, lighting etc);
- * proposed and existing functional services above and below ground (e.g. drainage, power, communications, cables, pipelines etc indicating lines, manholes, supports);
- * retained historic landscape features and proposed restoration, where relevant.

* arboricultural method statement

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

- 7 All soft landscaping comprised in the approved details of landscaping for each relevant phase (as referred to in Condition 5) shall be carried out in the first planting and seeding season following the first occupation of the building(s) or the completion of the development within that phase whichever is the sooner. All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development in the relevant phase or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

- 8 No development shall commence on each relevant phase (as referred to in Condition 5) until details of the estate roads, footways, footpaths, cycle tracks, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, vehicle overhang margins, embankments, visibility splays, accesses, carriageway gradients, drive gradients, car parking and street furniture within that phase and a timetable for implementation and provision of such works has been submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner and to ensure that the roads are laid out and constructed in a satisfactory manner

- 9 No development shall commence on site until details of how and when an access will be provided to the offsite ecology area and how the proposed development hereby approved including the construction period will ensure that the adjacent sports field access (to Melksham Rugby and Football Club) remains unobstructed. The development shall be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences.

- 10 No development shall commence on site until a written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority. The approved programme of archaeological work shall then be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be

considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the recording of any matters of archaeological interest.

- 11 No development shall commence on site until a Construction Traffic Management Plan (CTMP) which shall include inter alia, proposals for the phasing of the development, and how this might influence construction traffic routeing, and proposals to ensure that the adjacent highway is kept clear of site detritus has been submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner and to ensure that the amenity of the local highway network is adequately protected.

- 12 No development shall commence on site until a dust suppression scheme has been submitted to and approved in writing by the Local Planning Authority and shall be designed to minimise any windblown dust from the construction of the development affecting adjoining neighbouring properties. This scheme should cover all the phases of the construction site, including earth works, spoil heap storage, vehicle movements and cutting of materials. The development shall be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner.

- 13 No development shall commence on each relevant phase (as referred to in Condition 5) until a noise impact assessment and a scheme for protecting the affected proposed dwellings and their curtilages within that phase from road traffic noise has been submitted to and approved in writing by the Local Planning Authority. Any works which form part of the details approved by the Local Planning Authority shall be completed before occupation of any approved residential dwelling affected by the road traffic noise (as determined by the assessment within that phase).

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to protect the amenity of future residents.

- 14 No development shall commence on each relevant phase (as referred to in Condition 5) until details of a foul drainage disposal scheme to serve the development within that phase has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details prior to the occupation of any approved building within the relevant phase.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner.

15 No development shall commence on each relevant phase (as referred to in Condition 5) until details of a storm drainage disposal scheme to serve the development within that phase has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details prior to the occupation of any approved building within the relevant phase.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner.

16 No development shall commence on each relevant phase (as referred to in Condition 5) until details of a surface water management scheme for that phase, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the Local Planning Authority. The submitted details shall clarify the intended future ownership and maintenance provision for all surface water drainage works serving the development within that phase. The scheme shall subsequently be implemented in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to prevent the increased risk of flooding, and ensure future maintenance of the surface water drainage system.

17 No development shall commence on site until a scheme for water efficiency has been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner and to maximise water efficiency on the development.

18 No development shall commence on site until a landscape environment management plan (LMP), including long-term design objectives, management responsibilities and maintenance schedules for all landscape areas (other than small, privately owned, domestic gardens) and a timetable for implementation has been submitted to and approved in writing by the Local Planning Authority. The landscape environment management plan shall be carried out and implemented in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to the granting of planning permission and the matter is required to be agreed in writing by the Local Planning Authority before development commences in order to ensure the proper management of the landscaped areas in the interest of visual amenity and protection of adjacent listed buildings.

19 No development shall commence on site until a Landscape and Ecological Management Plan (LEMP) has been submitted to, and approved in writing by, the Local Planning Authority.. The content of the LEMP shall include, but not necessarily be limited to, the following information:

a) Full specification of habitats to be created, including locally native species of local

provenance and locally characteristic species;

- b) Description and evaluation of features to be managed; including location(s) shown on a site map;
- c) Landscape and ecological trends and constraints on site that might influence management;
- d) Aims and objectives of management;
- e) Appropriate management options for achieving aims and objectives;
- f) Prescriptions for management actions;
- g) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a 5-10 year period);
- h) Details of the body or organisation responsible for implementation of the plan;
- i) Ongoing monitoring and remedial measures;
- j) Timeframe for reviewing the plan; and
- k) Details of how the aims and objectives of the LEMP will be communicated to the occupiers of the development.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body (ies) responsible for its delivery.

The Plan shall also set out (where the results from monitoring show that the conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented.

The LEMP shall be implemented in full in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order to ensure the long-term management of protected and priority habitats and other landscape and ecological features, and to maintain and enhance these habitats and features in perpetuity.

- 20 No development shall commence on site until a habitat creation plan has been submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner.

- 21 No development shall commence on the relief road until details of how the relief road will be designed to avoid impact on amphibians have been submitted to and approved in writing by the Local Planning Authority. The relief road shall then be constructed in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be

- considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner and in the interest of biodiversity
- 22 The construction of dwellings within each relevant phase (as referred to in Condition 5) shall not commence on site until details of the storage of refuse, including details of location, size, means of enclosure and materials to serve dwellings within that phase have been submitted to and approved in writing by the Local Planning Authority. A dwelling shall not be first occupied until the approved refuse storage for that dwelling has been completed and made available for use in accordance with the approved details and it shall be retained in accordance with the approved details thereafter.
- REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner and in the interest of public health and safety
- 23 No development shall commence on site until a waste audit regarding the construction of the site (Part a-g) of Policy WCS6 of the Waste Core Strategy) has been submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details.
- REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and in the interests of minimising waste from the construction development.
- 24 No external lighting shall be installed within each relevant phase (as referred to in Condition 5) until plans showing the type of light appliance, the height direction and position of fitting, illumination levels and light spillage of external lighting within that phase designed in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication "Guidance Notes for the Reduction of Obtrusive Light" (ILE, 2011)" and areas to be maintained as dark corridors (including the green corridor along the relief road around the southern and eastern sides of the site) have been submitted to and approved in writing by the Local Planning Authority. The approved lighting shall be installed and shall be maintained in accordance with the approved details and no additional external lighting shall be installed.
- REASON: In the interests of the amenities of the area and to minimise unnecessary light spillage above and outside the development site including towards designated and non-designated heritage assets and to protected ecological species.
- 25 Prior to the occupation of each dwelling, the roads including footpaths and turning spaces serving that dwelling shall be constructed with a properly consolidated and surfaced to at least binder course level between the dwelling and the existing adopted highway.
- REASON: To ensure that the development is served by an adequate means of access
- 26 Prior to the occupation of the first dwelling hereby permitted, the highway infrastructure identified as Phase 1 on drawing number 10154-PP-01 Rev A shall be constructed and completed in accordance with the approved plans.
- REASON: In the interest of highway safety

27 No more than 250 dwellings hereby permitted shall be occupied until the highway infrastructure identified as Phase 2 on drawing number 10154-PP-01 Rev A has been constructed and completed in accordance with the approved plans.

REASON: In the interest of highway safety

28 No more than 350 dwellings hereby permitted shall be occupied until the highway infrastructure identified as Phase 3 on drawing number 10154-PP-01 Rev A has been constructed and completed in accordance with the approved plans.

REASON: In the interest of highway safety

29 No dwelling hereby permitted shall be occupied until a public art scheme for the site and a timetable for installation has been submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure the proposal complies with the relevant public art policies.

30 The dwellings hereby permitted shall achieve a level of energy performance at or equivalent to Level 4 of the Code for Sustainable Homes. No dwellings shall be occupied until evidence has been issued and submitted to and approved in writing by the Local Planning Authority certifying that this level or equivalent has been achieved

REASON: To comply with Core Policy 41 of the Wiltshire Core Strategy 2015.

31 Demolition or construction works on the site hereby approved shall not take place outside 07:30 hours to 17:30 hours Mondays to Fridays and 08:00 hours to 12:30 hours on Saturdays nor at any time on Sundays or Bank Holidays.

REASON: In the interest of protecting the amenity of nearby residential properties.

32 The development hereby permitted shall be carried out in accordance with the following approved plans:

Site Location Plan 4769-L-03-C - received 16 January 2015; Transport Statement, Phasing Plan -10154-PP-01-REV C, Eastern Relief Road Sheet 1 10154-HL-03-Rev D, Eastern Relief Road Sheet 2 10154-HL-04-Rev E, Eastern Relief Road Sheet 3 10154-HL-05-Rev D, Eastern Relief Road Sheet 4 10154-HL-07-Rev F, Indicative Landscaping Plan 4769-L-05-REV G, Northern Access Plan 10484-SK-03-Rev C, Indicative Planting Scheme 4769-L-04-Rev K, Parameters Plan 4769-L-06-Rev J, Green Infrastructure 4769-L08-Rev F and Accessible Open Space 4769-L-08-Rev H - all received on 21 December 2017

REASON: For the avoidance of doubt and in the interests of proper planning.

Planning Informatives

1 This permission shall be read in conjunction with an Agreement made under Section 106 of the Town and Country Planning Act, 1990 and dated 22nd September 2016

2 In order to discharge the surface water management scheme the Environment Agency would expect to see the inclusion of the following:

A clearly labelled drainage layout plan showing the pipe networks and (where appropriate) any attenuation ponds, soakaways and drainage storage tanks. This plan should show any pipe node numbers referred to in the drainage calculations and the invert and cover levels of manholes;

A manhole schedule;

Model runs to demonstrate that the critical storm duration is being used;

Confirmation of the appropriate discharge rates and volumes, with any flow control devices indicated on the plan with the rate of discharge stated; It is noted that discharge is to be to a single ditch. This ditch must currently receive flows from this site and the post development discharge rate and volume into that ditch must not exceed the existing rate and volume of discharge into the ditch. A 'site-wide' catchment analysis will be required to verify how much of the site currently flows into the ditch and hence to determine the acceptable flows.

Calculations showing the volume of attenuation provided, demonstrating how the system operates during a 1 in 100 critical duration storm event;

Exceedence flow can occur during short but very intense rain storms, or if system blockage occurs etc. The large volume of runoff generated from impermeable surfaces during such events may not all be captured by the drainage system and unless otherwise intercepted a proportion would flow downslope possibly onto land under other ownership. For surcharge / flooding from the system, overland flood flow routes and "collection" areas on site (e.g. car parks, landscaping) must be shown on a drawing. CIRIA good practice guide for designing for exceedance in urban drainage (C635) should be used. The run-off from the site during a 1 in 100 year storm plus an allowance for climate change must be contained within the site and must not reach unsafe depths on site;

A 30% allowance for climate change should be incorporated into the scheme in accordance with PPS25;

Where infiltration forms part of the proposed stormwater system such as infiltration trenches and soakaways, soakage test results and test locations are to be submitted in accordance with BRE digest 365.

Specification of how the scheme will be maintained and managed after completion.

- 3 The applicant is advised that the development hereby approved represents chargeable development under the Community Infrastructure Levy Regulations 2010 (as amended) and Wiltshire Council's CIL Charging Schedule. A separate Community Infrastructure Levy Liability Notice will be issued by the Local Planning Authority. Should you require further information with regards to CIL please refer to the Council's Website

www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/communityinfrastructurelevy

- 4 The applicant is advised that the reserved matters application should include low-rise development to ensure no harm is raised to the significance of the existing built historic environment.

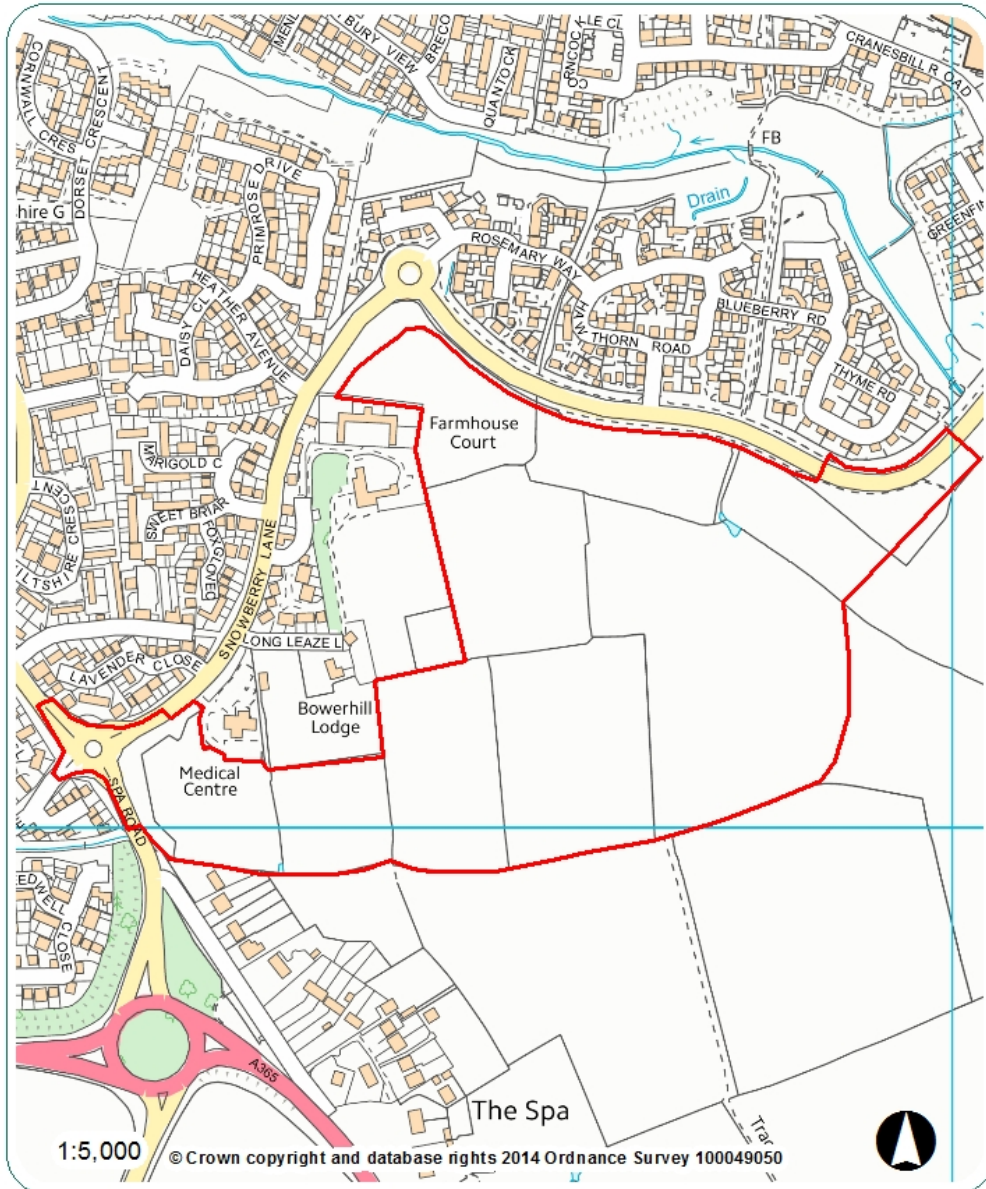
- 5 Please note that Council offices do not have the facility to receive material samples. Please deliver material samples to site and inform the Planning Officer where they are to be found.

- 6 Safeguards should be implemented during the construction phase to minimise the risks of pollution and detrimental effects to the water interests in and around the site. Such safeguards should cover the use of plant and machinery, oils/chemicals and materials; the use and routing of heavy plant and vehicles; the location and form of work and storage areas and compounds and the control and removal of spoil and wastes. We recommend the applicant refer to our Pollution Prevention Guidelines, which can be found at: <https://www.gov.uk/government/collections/pollution-prevention-guidance-ppg>

- 7 It is important for the applicant to note that the reserved matters application(s) should respect the setting of the listed buildings and listed walls and should include details of how they will be protected.

- 8 The Strategic Planning Committee welcomes the fact that the Developer has agreed to form a Neighbourhood Liaison Group.

This page is intentionally left blank



This page is intentionally left blank