

WILTSHIRE HOUSING SITE ALLOCATIONS PLAN (WHSAP) EXAMINATION

MATTER 2:

CONSISTENCY WITH THE WILTSHIRE CORE STRATEGY (WCS)

ON BEHALF OF:

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2. ISSUE 2: DOES THE WHSAP MAKE ADEQUATE PROVISION TO MEET HOUSING REQUIREMENTS AS SET OUT IN THE WCS?

2.1 The WCS contains housing figures at a County, HMA and settlement level. Which is the most appropriate scale at which to consider provision in order to assess consistency with the WCS?

2.1.1 Core Policy 1 sets out the settlement strategy and identifies the different tiers of settlements based on the understanding of the role and function. The settlement strategy is then coupled with the Delivery Strategy in Core Policy 2 which seeks to deliver development across Wiltshire in the plan period according to the HMAs.

2.1.2 Paragraph 43 of the Inspector's report stated that it is clear that the distribution of land in terms of ensuring adequate supply will be disaggregated in accordance with three housing market areas. He concluded that such an approach was an appropriate scale for consideration of housing need rather than the Community Areas. The levels of housing for each Community Area is indicative rather than prescriptive and this enables a more flexible approach to manage the delivery of housing in each HMA.

2.1.3 The WCS Inspector identified that the OAN, to be disaggregated across the three HMAs was in the region of 44,000 homes across Wiltshire (paragraph 78 of Inspectors Report). However, given that the NPPF required the Local Plan to meet the full OAN in the relevant HMA as far as consistent with other policies in the NPPF, the Plan also needed to be aspirational and realistic, the concern in setting the housing requirement was that it needed to be deliverable and due to a more cautious approach regarding housing delivery, but whilst still enabling a boost to supply significantly above recent annual performance the Inspector found a requirement of 42,000 homes to be sound as this would provide a significant boost whilst being achievable (paragraph 80) and that this would be reviewed by a SHMA in early 2016 (paragraph 81). (At that time a partial review of the Core Strategy was envisaged and an early review of the CS, the Sites DPD, the Chippenham DPD and neighbourhood planning would enable the Council to proactively seek to meet and if necessary reassess its objectively assessed housing need). The Inspector considered that the minimum housing figure in the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more (paragraph 81).

- 2.1.4 Core Policy 2 of the WCS provides the minimum housing requirement for each HMA, which provides for a minimum of 41,100 homes with an additional 900 at the West of Swindon (totalling 42,000); but enables some flexibility within each HMA e.g. as set out in paragraph 4.34.
- 2.1.5 Paragraph 4.20 of the adopted Core Strategy states that Wiltshire's proposed housing requirement is set out against defined sub county areas as identified in the SHMA i.e. East Wiltshire, North and West Wiltshire and South Wiltshire HMA. It is therefore necessary that these are met or exceeded as a minimum.
- 2.1.6 Whilst it is noted that it is not the purpose of this examination to re-open any discussions on matters that were considered at the examination of the Wiltshire Core Strategy (WCS); nevertheless as the Council consider that they can demonstrate in excess of the OAN (44,000 dwellings) they are obliged by the NPPF 2012 to have a housing requirement that reflects this figure (ref paragraph 47).
- 2.1.7 The new SHMA (2017) published to inform the review of their local plans including the preparation of a non-statutory Joint Spatial Framework, to enable each plan period to be extended to 2026 has identified that the need is 43,247 dwellings i.e. in excess of Core Policy 2. (Similarly, although not relevant for the purpose of this examination it remains material that the standard method identifies a need for 44,805 homes).
- 2.1.8 Therefore, whilst the need has remained broadly consistent (44,000 to 43,247 to 44,805), the constraint which was found sound by the WCS Inspector is no longer justifiable. As an inevitable result, Core Policy 2 is out-of-date, such that if this is not reviewed all planning applications will be considered in the context of the 'tilted balance'.
- 2.1.9 As the need has already been established through the WCS examination, and it is only the constraint which is out-of-date, it is unnecessary to consider this in detail. The minimum housing requirement should be 44,000 to accord with paragraphs 14 and 47 of the former NPPF under which this plan is being examined.
- 2.1.10 Table 1 of the WCS provides indicative requirements for each Community Area (CA) and each sub-CA area. Paragraph 4.20 identifies that these allow a

- flexible approach which will allow the Council to respond positively to opportunities through the WHSAP.
- 2.1.11 Paragraph 4.30 indicates that these indicative requirements are not intended to be so prescriptive as to be inflexible or ineffective, and that they provide the framework for the WHSAP.
- 2.1.12 Paragraph 4.33 identifies that they provide for an appropriate distribution of housing and the most sustainable pattern of growth. Paragraph 4.33 states that the housing market areas form the appropriate scale for disaggregation across Wiltshire. Indicative requirements are then provided for each Community Area within each HMA. The indicative figures deliberately allow a flexible approach so that sustainable development can be delivered to assist in maintaining a 5yr supply.
- 2.1.13 However, paragraph 4.34 goes on to identify that it would be appropriate for the supply in one sub-CA area to contribute to the requirements of another within the same HMA, but that it would be wholly inappropriate for the entirety of the indicative requirement to be met within another sub-CA area.
- 2.1.14 Therefore, the minimum requirement for each HMA must be met ideally in accordance with the indicative sub-CA requirements, but there is some flexibility for these to be met elsewhere where, for example, there is insufficient capacity providing the broad spatial strategy is maintained (addressed under Issue 3).

2.2 Based on the most up-to-date evidence, what is the residual level of development required to meet the housing requirement identified in the WCS? What component of this is the WHSAP expected to meet?

2.2.1 Annex A in the Proposed Changes (EXAM01) PC15 indicates that if all the sites (including windfalls) deliver as anticipated, then there is a surplus in all the HMAs. However, this only occurs providing the sites deliver as anticipated by the Council (see below).

2.2.2 In South Wiltshire HMA, the Council has identified a capacity for only 9,893 homes (=5,388+3,701+804 from Table 4.7 of Annex A to WHSAP 03.01) as compared with the minimum out-of-date housing requirement for 10,420. This gives rise to a shortfall of 527 homes. In South Wiltshire HMA the Council rely on a windfall allowance of 743 homes to address this in the period 2017-2026.

2.2.3 The method for calculating the windfall allowance in Wiltshire was considered through the WCS examination and it is specified on page 421 of the WCS. The Council has chosen to adopt a different windfall allowance which is contrary to the WCS, not only South Wiltshire HMA but also the other two HMAs.

2.2.4 The Housing Land Supply April 2014 (published July 2014) provides the windfall figures which accord with the method specified in the WCS and produces a smaller site windfall allowance.

2.2.5 For South Wiltshire HMA of only 340 homes in 9 years with an additional large site windfall allowance of 91 homes.

2.2.6 These figures are significantly different than those proposed in the Housing Site Allocations DPD in PC 15 Table 4.7

2.2.7 Furthermore, it should be noted that the large site windfalls will double count the allocations in the WHSAP as they are large sites which would previously have come forward, but which should now be allocated in the WHSAP. As a result, the large site windfall allowance should no longer be relied upon.

2.2.8 Consequently, the result is that even with the windfall allowance as specified in the WCS, there are insufficient allocations in South Wiltshire HMA, even if all of the sites deliver as anticipated by the Council.

- 2.2.9 As identified above there is insufficient capacity to meet the minimum out-of-date housing requirement for South Wiltshire HMA.
- 2.2.10 This position arises as a result of the shortfalls which occur in Amesbury, Bulford and Durrington (a shortfall of 121 homes), Amesbury CA remainder (a shortfall of 96 homes), Salisbury and Wilton (a shortfall of 122 homes), Wilton CA remainder (a shortfall of 118 homes), Tisbury (a shortfall of 22 homes) and Tisbury CA remainder (a shortfall of 142 homes);
- 2.2.11 In order to meet the minimum out-of-date housing requirement, accord with the spatial strategy of the WCS and restore a five-year land supply, it will be necessary to allocate additional sites in these sub-areas especially where the shortfalls are large.
- 2.2.12 The WHSAP proposes that it is appropriate to meet these indicative requirements (which themselves do not meet needs) in other sub-areas which may result in a fundamentally different spatial strategy (addressed under Issue 3) although this may be necessary if the indicative requirements cannot be met.
- 2.2.13 Table C1 of the WCS indicates that the WHSAP and neighbourhood plan allocations are expected as a minimum to address the full shortfall which arises once the windfall allowance of the WCS has been applied.
- 2.2.14 In South Wiltshire HMA, Table 4.7 of Annex A to WHSAP 03.01 indicates that there have been 5,388 completions, there are 3,701 commitments and 804 are proposed on allocations. This provides a total of 9,893. The windfall allowance specified in the WCS provides for an additional 340 homes producing a total of 10,233 homes as compared to the minimum requirement for 10,420;
- 2.2.15 It is therefore necessary as a minimum for an additional 187 homes to be identified on additional allocations within South Wiltshire HMA which are capable of delivery within the plan period.
- 2.2.16 A key issue in the consideration of this plan is that the WCS will become out-of-date in January 2020, and consequently if the Housing Site Allocations Plan is adopted later this year it will have a housing requirement that will shortly be out-of-date. It is therefore considered that the housing requirement should be amended to reflect the WCS Inspector's view, "*Overall, the balance of evidence*

suggests that the objectively assessed housing need, to be disaggregated across the three Wiltshire HMAs, is currently in the region of 44,000 dwellings over the plan period."

- 2.2.17 We have set out in our representations to the Pre-Submission Draft Plan in September 2017 why there can be no reason for not meeting the full OAN as required in paragraph 47 of the NPPF 2012 (representations to Table 4.7). The Housing Site Allocations Plan should therefore seek to deliver the OAN of 44,000 dwellings, such an approach would be wholly consistent with the housing requirement of the Core Strategy which requires the delivery of at least 42,000 dwellings.

2.3 Are the components of delivery identified in the Plan, including completions, committed developments and windfalls, justified and realistic?

2.3.1 PC 15 provides an update to Table 4.7 to reflect the latest housing land supply statement. Our most recent representations (November 2018) responding to the Proposed Changes address these points.

Windfalls

2.3.2 There are a number of sources of supply in the HLSS which should not be relied upon to deliver e.g. windfalls as outlined below. In our representations to PC4 we questioned the methodology for windfalls, as this deviates from the approach in the adopted WCS. The approach in the WCS was found sound.

2.3.3 The Council are now using an approach which gives a higher figure and are relying on a greater number of large windfall sites than found sound by the Inspector for the Core Strategy.

2.3.4 The Council are also allocating sites, therefore the capacity is reduced for windfalls as these sites will come forward as allocations. This would suggest that the number of windfalls will be below the declining historic trend.

2.3.5 In the adopted Core Strategy the Council relied upon Method 1 (as set out in the July 2014 HLSS) i.e. for South Wiltshire over 5 years the windfall allowance was 230 dwellings. The Council are now using Method 3 from the 2014 HLSS (now referred to as Method A) which generates 330 dwellings over the 5 years. However, the consistent application of Method 3 / Method A shows how the number of windfalls has decreased over time i.e. from 449 dwellings over 5 years to 330 dwellings over 5 years. This shows windfalls are declining and yet the Council persist with a method which is totally reliant on historic trends of windfalls.

2.3.6 The Council are also allocating sites, therefore the capacity is reduced for windfalls as these sites will come forward as allocations. This would suggest that the number of windfalls will be below the declining historic trend.

2.3.7 At the recent appeal at Alderbury inquiry, the Inspector noted that the approach now adopted by the LPA was based on historic trends and relies upon a continuous supply of a decreasing capacity of large windfall sites. The

number of windfall permissions has broadly declined since 2009 and he concluded that there is no cogent evidence to show that the LPA's figure is conservative and reliable quantum to use for the purposes of HLS. The Inspector concluded that there was greater merit in using the appellant's lower figure, which is based on the CS methodology and has been shown to be robust by the appellant following an interrogation of the figures in the LPA's 2017 Housing Land Supply Statement.

- 2.3.8 It is considered that going forward for the remaining plan period that there is an over reliance on windfalls.

Saved Local Plan Allocations

- 2.3.9 The Council continue to rely upon the delivery of saved Local Plan allocations in the Table 4.7. Appendix 1 of the HLSS, March 2018 although the number of sites and the contribution from those sites has reduced significantly as the Council have acknowledged that the Churchfield site will not come forward until beyond the plan period. There are still some saved local plan sites that are included eg Bulbridge, Oldstock hospital, Old Manor Hospital.

- 2.3.10 It can be concluded that these sites were allocated in June 2003 and saved again in February 2012. In the intervening years these sites have not delivered and as such they are unlikely to provide a reliable source of supply in the future.

- 2.3.11 The WHSAP is being examined in the context of the former NPPF as such any finding on the five-year land supply which is reached in the context of the examination will not apply for decision-taking purposes either before or after adoption. It is considered that this point should be made explicit in the Inspectors report.

- 2.3.12 However, if the Inspector wants to consider this on the basis of the current NPPF (which will apply to decision-taking) as well as the former NPPF (which applies for the examination), a summary response is provided below.

Plan period supply in South Wiltshire

- 2.3.13 As identified previously, even based on the trajectory of the Council there is a plan period shortfall in South Wiltshire. Once the windfall allowance of the WCS

- is applied there is capacity for 10,234 homes as compared to the minimum requirement for 10,420.
- 2.3.14 However, at the recent Alderbury Inquiry (held in November 2018) the Inspector agreed with Pegasus Group that the contribution from certain sources of supply would be even less.
- 2.3.15 The Council accepted that the site at Bulbridge was not deliverable and given the extensive record of non-delivery at this site it should not be considered developable. This would increase the shortfall by 45 homes.
- 2.3.16 The Inspector agreed that as a result of the delays which have already occurred at Fugglestone Red and Kings Gate, the contributions from these sites should also be reduced. Across the plan period, this would reduce the supply by 257 homes and 215 homes respectively.
- 2.3.17 In total taking account of only those sites which the Alderbury Inspector found it necessary to consider, the maximum plan period supply of the Council in South Wiltshire is 9,717 which represents a shortfall of 703 homes compared to the minimum housing requirement (which itself does not reflect the need).
- 2.3.18 Therefore, in order to meet the minimum out-of-date housing requirement, it is considered necessary to make additional allocations providing at least 703 homes in South Wiltshire.

Five-year supply in South Wiltshire

- 2.3.19 The shortfall in South Wiltshire HMA needs to be addressed urgently as the latest Inspector who has considered this matter in South Wiltshire HMA has concluded that the Council is already unable to demonstrate a five-year land supply. Whilst the Inspector was not explicit based on his findings on the use of the Sedgefield approach, the windfall allowance, Fugglestone Red and Kings Gate, it can be calculated that he considered that there was a 4.3 year land supply with a shortfall of 446 homes.
- 2.3.20 The sites at Clover Lane, Larkhill Road, Hilltop Way and The Yard are of a scale that they could realistically contribute to the deliverable supply providing clear evidence was provided that this will be achieved. However, these only provide 69 unpermitted homes in total which will reduce the shortfall to 377 homes.

- 2.3.21 The other sites (Land at Netherhampton Road, North of Netherhampton Road and Rowbarrow) are all of such a scale that even following the submission of a planning application it would be expected that completions wouldn't be achieved for 4 years even if they weren't subject to the constraints identified in the emerging WHSAP.
- 2.3.22 Therefore, in order to restore a five-year land supply (even against the out-of-date minimum housing requirement) it will be necessary to allocate additional sites that can deliver early in South Wiltshire HMA.

2.4 In light of the above, does the WHSAP make adequate overall provision to ensure the delivery of the minimum housing requirement as set out in the WCS?

2.4.1 It is considered for the reasons set out in our representations that the minimum housing requirement is no longer justified and it is out-of-date.

2.4.2 According to the Council's own figures and the findings of the most recent S78 Inspector in the Alderbury appeal (decision date December 2018), even against these minimum housing requirements, the WHSAP does not make adequate provision in South Wiltshire, and consequently additional site(s) should be allocated in the Housing Site Allocations DPD rather than as suggested in PC16 be addressed later in the review of the Wiltshire Core Strategy.

2.4.3 The Wiltshire Core Strategy is significantly delayed. It is over eighteen months since there was a consultation on the scoping of the Core Strategy Review and no further consultation is envisaged until early 2020. Consequently, the Site Allocations Plan will not be able to rely upon the Wiltshire Core Strategy to address the housing shortfall later in the plan period. In order to ensure that there is a five year housing land supply it is considered that a contingency site needs to be included in the plan. Whilst it is appreciated that the Inspector is not considering omission sites, the Council should re-consider land north of the Portway, Old Sarum which has previously been identified in the WCS as an area suitable for additional growth.

2.5 Is the predicted delivery of allocated sites realistic in terms of the contribution they would make through the Plan period?

2.5.1 The Council has not prepared trajectories for these sites and so it is not possible to assess the realism of the trajectories assumed by the Council.

2.5.2 In view of our objections to the Housing Land Supply and our objections to the allocation of Netherhampton Road (the latter is set out in detail in response to the Draft Plan in September 2017) it is considered that the developable commitments (which includes proposed allocations) should be increased to reflect the fact the overall housing requirement is a minimum (indicative housing requirement and is therefore not a ceiling figure). The Council, based on their own figures acknowledge that *“the surplus amount possible over the indicative requirement for the plan period is modest even at face value”*. In view of the above there should be a contingency site included in order to support/maintain the five year housing land supply and housing delivery across the plan period and support the role of Salisbury as the Principal Settlement and focus for development in the HMA.

3. ISSUE 3: DOES THE DISTRIBUTION OF SITE ALLOCATIONS ACCORD WITH THE SPATIAL STRATEGY IN THE WCS?

3.1 Is the overall distribution of housing allocations consistent with the spatial strategy set out in the WCS?

3.1.1 Pegasus does not have any issues with the distribution of development which is in accordance with the strategy. The issue that we do have is that 74% of the Salisbury housing allocations are in one location, with many unknown and unresolved issues, risks a significant housing shortage in Salisbury within the plan period, by limiting the potential housing supply to one large site in Salisbury within the plan period. Pegasus remain concerned about the delivery as set out in the housing trajectory.

3.2 Is the distribution within each HMA consistent with the WCS?

3.2.1 No comments.

3.3 Is the approach set out in Stages 1 and 2 of the site selection process justified? In particular, has a consistent and justified approach been taken to excluding specific locations from the scope of the exercise, including:

- **Principal Settlements, Market Towns, Local Service Centres and Large Villages;**
- **areas where housing needs in the WCS are indicated to have been met; and**
- **areas with made or emerging Neighbourhood Plans? (** Note, in responding to this question, the Council is requested to provide an up to date assessment of the stage each relevant Neighbourhood Plan is at in its preparation*).**

3.3.1 No comment.

3.4 Are the differences between overall provision identified in the WHSAP and the WCS justified? Should any shortfalls in provision within particular settlements be compensated for with development in other locations?

3.4.1 No comment.

4. ISSUE 4: HAS THE SITE SELECTION PROCESS FOR HOUSING ALLOCATIONS BEEN SOUNDLY BASED?

4.1 Have the site allocations been undertaken on a consistent basis having regard to the strategic objectives and policies of the WCS, the policies of the NPPF and the evidence base?

4.1.1 In our representations in response to the Pre-Submission Draft in September 2017, Pegasus commented on the site selection process in response to Policy H3.1 and Policy H.3.

4.1.2 Pegasus objected to the proposal to allocate 85% of the potential future allocated housing in one location at Netherhampton Road. Our concerns were set out in respect of Traffic, Landscape, the reliance on one site at Netherhampton Road.

4.2 Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear?

- 4.2.1 We comment on the site selection process in our representations on the Pre-Submission Draft in particular, the assessment and scoring of sites and the progression or exclusion of sites in the ongoing assessment. It is acknowledged that this is not an opportunity to promote omission sites. Therefore the points in the following paragraphs seek to draw out the inadequacies of the scoring against the SA objectives. Pegasus consider that the criteria for the site selection process has been misapplied and underestimated the capability for effective mitigation for development at site S80.
- 4.2.2 Land to the north of the Portway site S80 did not progress to Stage 4 of the site selection process by reason of having 5 or more of the SA objectives recorded as "moderate adverse effects" i.e. where "mitigation is likely to be difficult or problematic".
- 4.2.3 The site has essentially not been advanced based on "moderate adverse effect" being recorded against 5 out of 12 of the SA objectives. However, it should be noted that all but one site scored the same for SA Objective 3 i.e. a moderate adverse effect on the use and management of water resources. All sites scored "moderate adverse effect against SA Objective", i.e. Protect and enhance all biodiversity and geological features and avoid irreversible losses. Similarly against SA Objective 6, "Protect, maintain and enhance the historic environment" only two sites scored a minor adverse effect, most sites scored a "moderate adverse effect" and two sites were assessed as "major adverse effect."
- 4.2.4 Land in this area was originally allotted in the Salisbury District Local Plan (2004) for mixed use development including housing, employment, retail, education, recreation and community uses. Outline permission was granted in June 2007 for mixed use development with 630 dwellings, but with areas reserved for post 2011 development. Consequently, there have been consents for an additional 180 dwellings within the boundaries of the site. The residential estate extends to part of the south western boundary of site S80 with the remaining boundary adjoining public open space forming part of the Old Sarum development.

- 4.2.5 A further mixed use development was allocated on land between the Old Sarum development and the A345, known as Longhedge. This area was allocated in the South Wiltshire Core Strategy for 450 dwellings and 8 hectares of employment. Subsequently, outline planning permission was granted for a mixed use scheme comprising 673 dwellings, the development of which is currently under construction.
- 4.2.6 Over a period of approximately 10 years, the LPA has developed a strategy which has focussed development at Old Sarum, with the objective of a new community with a high level of self-containment whilst having good public transport access to the city centre. S80 is well located in relation to the mixed use development at both sites.
- 4.2.7 In our representations to Policy H3 evidence (Preliminary Assessments for Ecological Assessment, Drainage Assessment, Heritage Assessment, were provided to dispute some of the assumption inherent in the Council's recorded assessment scales for the site.
- 4.2.8 In summary it appears that the land to the north of the Portway (ref S80) has essentially not been advanced based on "moderate adverse effect" being recorded against five objectives (but in actual fact for three of the SA objectives this assessment applied to most if not all the sites). From our analysis, at most only 2 of the SA objectives could be rated as "moderate adverse effects" consequently, it is considered that the site should be re-considered to make up the shortfall.

4.3 Have the site allocations been made in accordance with Diagrams 2 and 3 of the Planning Practice Guidance on Flood Risk and Coastal Change, including the application of the sequential and exception tests?

4.3.1 This is more of a matter for the Council.

4.4 Have the cumulative transport related implications of allocated sites been fully assessed and are measures to address them sufficiently clear and deliverable?

4.4.1 This is more of a matter for the Council.

4.5 Have the cumulative effects of development on protected habitats and species? Will the plan be effective in ensuring their protection and/or mitigating any effects?

4.5.1 This is more of a matter for the Council.

4.6 Have the cumulative infrastructure requirements of allocated sites been fully assessed, including the need for education facilities, and are measures to address them sufficiently clear and deliverable?

4.6.1 This is more of a matter for the Council.