

Wiltshire Housing Site Allocations Plan

Submission Draft Plan – July 2018

Statement on Matter 3: Housing Site Allocations - in particular Site H3.4 Land at Rowbarrow, Salisbury

By

**Savills on behalf of Bellway Homes Limited
(Wessex) (Ref. Policy H3)**

March 2019



1.0 Introduction

Savills Planning (SP) has been promoting this site for residential development since 2013.

On behalf of the landowners, SP made representations on Wiltshire Council's consultation on the Pre-Submission Draft of the Wiltshire Housing Site Allocations Plan (WHSAP) in September 2017.



The representations comprised:

- Savills Supporting Statement (Above), with the following specialist studies below, the summaries of which were included in the Supporting Statement:
 - A Flood Risk, Surface Water Drainage and Utilities report
 - An Ecological Appraisal
 - A Heritage Appraisal
 - A Landscape and Visual Impact Appraisal (LVIA)
 - A Transport Report

This site was subsequently included in the Pre-Submission Draft as:

Community Area	Plan Reference	Site Name	No. of dwellings
SALISBURY	H3.4	Land at Rowbarrow	100

In order to help progress delivery of actual dwellings on the site the landowners signed an Option Agreement with Bellway Homes Wessex Limited (Bellway) in July 2018.

Also in July 2018, the Submission Draft of the WHSAP was submitted to PINS. Policy H3.4 remained unchanged.

During the Focused consultation, which ended in January 2019, Bellway requested representations be made objecting to the 100 dwellings mentioned in the draft policy. Bellway was having a revised housing layout prepared, which indicated that more than 100 dwellings could be accommodated on the site. A layout showing 120 was sent to the Council on 5th February 2019.

Subsequently, it was decided to amend this layout, keeping development within the envelope of the original masterplan, which had had regard to the Constraints and Opportunities Plan in the 2017 LVIA. This plan was sent to the Council on 25th February 2019. It was also decided to have updated

specialist studies prepared, which were to have regard to this latest layout plan and any intervening changes from when the original reports were prepared. These have also been sent to the Council.

2.0 Matter 3 of Inspector's Initial matters, Issues and Questions to the Council.

Issue 5: Are the proposed sites justified, effective and consistent with national policy?

Relevant questions and responses:

5.1 Does the plan provide sufficient detail on form, scale, access and quantity of development for each site?

Para 5.128 indicates that three considerations need to be considered for Salisbury allocations under policy H3, transport, education and biodiversity. Policy H3.4 specifically deals with land at Rowbarrow in paras 5.146 – 5.149, suggesting approximately 100 dwellings in a sustainable location. It deals with heritage and landscape matters. It also deals with contributions matters. For an allocations plan Bellway considers this is sufficient guiding information, albeit it maintains that the quantity of development could be increased to approximately 115 dwellings. (See next question)

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

The current plan suggests approximately 100 dwellings on 5.56ha. At the time of the pre-Submission Draft Plan, the promoters submitted an illustrative Masterplan drawn by an urban designer demonstrating that 100 dwellings could be more than adequately located within the site, taking into account known constraints. Bellway has now had an architect prepare a more detailed layout, within the same envelope as the previous plan. This demonstrates 115 dwellings from Bellway's housing range can adequately be located within the envelope, ranging from 1 bed flats to 4 bed houses, 40% of which would be affordable.

5.3 What is the likely impact of the proposed development on:

Biodiversity

In October 2018 Bellway commissioned an Ecological Appraisal & Phase 2 Surveys of the site at Rowbarrow. No significant issues were raised, with a number of recommendations made for the future.

Landscape Quality & Character and Green Infrastructure

An LVIA was carried out in September 2017. This concluded as follows:

In summary, it is acknowledged that the site occupies an elevated and open area of land that is distinguishable from as far away as Old Sarum to the north and Pepperbox Hill to the south. Given the panoramic nature of these views however, the sensitive development of the site need not result in any adverse visual effects. The site provides the opportunity to create a softened urban edge to the city, retaining a shelterbelt of mature beech trees, as well as an area of open space that could be enhanced with the restoration of chalk grassland. This open space would also include a small area of the Woodbury Ancient Villages Scheduled Ancient Monument, providing the opportunity for enhanced interpretation.

An addendum report was prepared in March 2019, in the light of Bellway's proposal for 115 dwellings. This concluded:

A review of the baseline surveys and landscape and visual appraisals (Sections 3-6) undertaken in 2017 show that the findings of that Appraisal still stand. There have been no notable changes to the landscape features on and around the site, published landscape character assessments or views within and into the site.

Whilst the Bellway Appraisal Layout shows a slightly different housing layout to the Savills Concept Masterplan that was used as the basis for the 2017 Appraisal, the key parameters which could have a landscape or visual impact remain the same. These can be summarised as follows:

- ☑ the areas of developed land and open space shown on both plans generally cover the same parts of the site, with a generous amount of open space being provided within the southern part of the site.*
- ☑ the beech tree belt is retained.*
- ☑ opportunities are taken to provide tree planting within the open space, as well as along the Odstock Road frontage.*
- ☑ space is also provided for a strip of planting along the site's northern-eastern boundary which can accommodate street trees.*
- ☑ a vista is incorporated within the street layout to allow a view towards Salisbury Cathedral from the open space and public right of way.*
- ☑ the housing layout generally reflects the density and character of adjacent housing to the north.*

As such, the conclusions of the 2017 Appraisal still stand in that the proposed development of the site would not have any significant adverse landscape or visual effects.

Agricultural Land

This issue is dealt with in the Council's Sustainability Appraisal under efficient and effective use of land. It states that:

This site is partially within Grade 1, 2 or 3a BMV agricultural land and therefore development of this site may lead to the loss of BMV agricultural land. Where possible development on this site should be located so as to reduce the loss of BMV. Overall, given the size of the development a minor adverse effect is anticipated.

Heritage Assets

CgMS prepared a Heritage Appraisal in March 2019. In summary this states:

A high-level appraisal of potential impacts on the historic environment, arising from the development of the site for housing, has been undertaken. It is considered that overall there will be limited effects on the significance of any built heritage assets. A very small level of harm to the setting of Salisbury Cathedral could arise, but it is considered that this would have a negligible effect on the significance of the Cathedral, as the site makes only a small contribution to a very wide setting. Part of the site overlaps with the boundary of Little Woodbury Scheduled Monument to the south, but the indicative masterplan for the site shows this area is not proposed for development. There is a high potential for archaeological remains, mainly from the Early Bronze Age to Middle Iron Age periods, to be present within the site. This potential could be mitigated through a programme of archaeological works. The archaeological potential is similar to adjacent sites, for which there was no bar to development due to heritage considerations. The appraisal has been carried out to a similar level as that provided for selected sites by the local authority in support of the Housing Allocation Plan.

Strategic and local infrastructure including transport

The efficient operation of the transport network, highway safety

Paul Basham Associates (PBA) prepared a Land Promotion Transport Report in March 2019. In summary this states:

- *The location of the site presents a good opportunity to promote sustainable travel and encourage a sustainable development.*
- *Trip generation demonstrates that the site would be anticipated to generate 518 trips across a 12-hour day with 53 trips in the AM peak period and 51 trips in the PM peak period. Although some junction assessments may be required as part of any application it is not anticipated that this increase would result in a severe impact on the operation or safety of the local highway network.*
- *Trip distribution demonstrates that the site is well located in relation to the strategic road network as it provides an opportunity to reduce the number of vehicles tracking through the New Bridge Roundabouts and into Salisbury – in fact 38% of development traffic would not be anticipated to use the New Bridge Road roundabouts.*
- *Access to the site would be most appropriately served via a right turn lane which would provide the opportunity to improve pedestrian connectivity across Odstock Road via a refuge island.*

PBA are also preparing a detailed plan of an access to the development off Odstock Road, which will be sent to the Council soon.

Air and water quality, noise pollution, odours, land stability, groundwater and flood risk

Air quality and sources of environmental pollution are covered in the council's Sustainability Appraisal. In respect of Rowbarrow it states that:

Development of the site for housing may have some limited adverse impacts on the Salisbury City centre AQMA approximately 1km away but it is considered unlikely to lead to significant exacerbation of local air quality issues and/or legal compliance targets

In March 2019 Stantec prepared a Site Appraisal Report on Flood Risk, Surface Water Drainage and Utilities in respect of the site. In respect of **flood risk** and surface water drainage they concluded as follows:

- *The site lies entirely within Flood Zone 1, the lowest classification of flood risk according to planning policy. The residential development proposals are acceptable within Flood Zone 1.*
- *No other significant sources of flooding were found that would affect the proposed development as part of the information gathered as part of this appointment.*
- *There are no watercourses nor existing public surface water sewers within the vicinity of the site in which surface water discharge would be viable. Information gathered indicates that it may be possible to discharge surface water on site via infiltration. (NB Other solutions such as aqua cells and/or deep bore soakaways or a sewer requisition process to connect to apparatus wider afield can also be explored at the planning application design stage).*

In respect of **Utilities**:

- Existing utility infrastructure is present within the proposed development boundary.
- A medium pressure gas main is in a north to south alignment running parallel to Odstock Road. Easement required.

- A nearby sub-station is sufficiently outside of the indicative development boundary such that it would not represent a constraint to development proposals.
- SSEN LV cables and Openreach ducts within the existing footways may need to be diverted or protected.

In respect of land stability, the British Geological Society online mapping indicates that the underlying bedrock is Culver Chalk Formation subject to further detailed testing there is unlikely to be any issues of slope stability as is evident from adjacent housing also built on the chalk downland.

5.4 In relation to the above, does the plan contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development?

It is noted that in the supporting text to policy H3 Salisbury and H3.4 Rowbarrow potential significant mitigation requirements are highlighted. Additionally, in a Screening Opinion for the development of up to 125 dwellings dated 9th July 2018, in confirming EIA is not required also offers advice on issues to be followed up, which Bellway has duly done.

5.5 What infrastructure is critical to the delivery of each site? Where contributions are specified, are they necessary and justified by the evidence base? Is the plan sufficiently clear on how and when infrastructure provision will be required?

The infrastructure required in respect of Land at Rowbarrow appears to be adequately covered in the supporting text to Policy H3 and the H3.4 Allocation. These stem from the Council's exhaustive evidence base. A plan such as this can only go so far in specifying how and when infrastructure provision will be required. Provided the necessary infrastructure is identified the how and when can be resolved at the planning application stage.

5.6 Is the site in an accessible location with good access to everyday facilities by a range of means of transport? Does the plan provide an adequate basis to address any areas of deficiency?

The Sustainability Appraisal identifies that the site is 1.7 km from the city centre. It states that:

The development of the site would provide housing in a location with a reasonable level of access to the local services and facilities in Salisbury.

There is a frequent bus route within 100m of the site and the Park & ride is in close proximity. Inevitably, however, development will lead to an increase in private car journeys and travel movements in this area.

Overall, this site is considered as having a minor adverse effect against the objective of reducing the need to travel and promoting more sustainable transport choices.

The report by PBA elaborates on this issue in section 2 of the report concluding that:

The site is well presented to become a sustainable development with opportunities to promote cycling and public transport use as sustainable methods of travel.

5.7 In cases where allocations do not have specific policies, is the reliance on supporting text likely to be an effective means of delivering the Council's requirements for each site? What is the justification for some sites having specific policies and some not?

There is clearly a difference in the way policies are drafted. Bellway Homes does not have an issue with the way policy H3.4 is currently drafted with its supporting text. Equally if this was redrafted into a policy with criteria relating to the issues in the supporting text it would not object.

5.8 Is the development proposed for each site deliverable in the timescales envisaged?

Bellway, a large housebuilding company, have an option on this site. They are already investing in preliminary technical studies and in the planning promotion of the site. If the site is allocated in this plan, they will be submitting a full planning application as soon as possible, bearing in mind the time to prepare same. If this plan is forecast for adoption in Q3 of 2019, they would hope to have an application submitted by the end of the year. With six months for determination and six months lead in to a start of construction, Bellway would hope to be on site in 2021 and have completed construction in approximately 3 years.

5.9 For sites in Salisbury, will the plan be effective in preserving or enhancing the setting of the Cathedral?

The Heritage Appraisal concludes:

A very small level of harm to the setting of Salisbury Cathedral could arise, but it is considered that this would have a negligible effect on the significance of the Cathedral, as the site makes only a small contribution to a very wide setting.

The LVIA 2019 concludes:

The site is not sufficiently close to the Cathedral for any development to have a significant effect on its setting. View 1 shown in the 2017 Appraisal (see Appendix 1 below) shows that the site can be seen in conjunction with the spire of the Cathedral from Old Sarum, however due to the distance involved, it appears as a very small element within a much wider panoramic view. There are no views of the site from the streets immediately adjacent to the Cathedral.

5.11 Is it realistic to expect development within the River Avon catchment to be 'phosphate neutral'?

This matter is covered in the SOCG with the Council restated below:

An assessment has been made by the Council in order to fulfil its statutory obligations under the Habitats Regulations and demonstrate that the Wiltshire Housing Site Allocations Plan would not have an adverse effect on the integrity of the Natura 2000 network either alone, or in combination with other plans and projects. This assessment has been made on the basis of the best available scientific knowledge at the time of writing. The River Avon SAC phosphate issue is covered in this document and an addendum to the HRA (September 2018) concludes that 'an agreed form of wording with the Environment Agency and Natural England has been inserted into the Plan that references the role of the Memorandum of Understanding [on phosphates] in order to provide greater certainty over the need to provide for phosphate neutral development'. This additional wording inserted into the plan is included in the Schedule of Proposed Changes (ref PC98) and this will allow phosphate neutral development to take place within the river catchment.

3.0 Conclusion

In respect of Matter 3, issue 5, as regards Land at Rowbarrow, covered in Policy H3 and allocated as site H3.4, Bellway consider that the WHSAP is legally compliant and sound.