

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H1.1 Empress Way, Ludgershall

PS/M3/14

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Matter 3: Housing Site Allocations

H1.1 Empress Way, Ludgershall

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| Issue 5: Are the proposed sites justified, effective and consistent with national policy? |
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Issue 5.1 - Does the plan provide sufficient detail on form, scale, access and quantity of development for each site?

1. Yes, Policies H1 and H1.1 and their supporting text provides sufficient detail on form, scale, access and quantity of development. Policy H1.1 of the WHSAP (WHSAP.01.01¹ and EXAM.01.01²) and its supporting text (paragraphs 5.17 – 5.21), when read in conjunction with the introductory text to Chapter 5 of the Plan (paragraphs 5.1-5.12) provide sufficient detail. The introductory text to Chapter 5 clarifies that the policies of the Wiltshire Core Strategy (WCO.01)³ will also apply in considering the development of the site. When taken together with the Core Strategy, the Council considers the Plan provides sufficient detail on form, scale, access and quantity of development.
1. The quantity of development to be delivered is approximately 270 dwellings, and vehicular access is proposed to be taken from Empress Way with a connecting highways link between Empress Way and Simonds Road/New Drove, via the adjoining development at the former Granby Gardens site. Policy H1.1 is clear on the form of development that will be delivered, which will include land for the potential future delivery of a primary school; a connecting link between Empress Way and Simonds Road/New Drove, and a strong landscape framework at the site boundaries.
2. When read as a whole, the Council considers that the level of detail provided in the Plan is sufficient for the purpose of providing the necessary certainty to local communities and developers without being overly prescriptive.

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

3. Yes, the amount of development proposed for allocation H1.1 is justified by the evidence base.
4. The quantum of development appropriate for this site was considered through the site selection process, and the conclusions are reported in the Tidworth Community Area Topic Paper (CATP.15)⁴ at Appendices D, F and G.
5. Sites that had been assessed through the Strategic Housing Land Availability Assessment (SHLAA) formed the starting point of further detailed assessment in line with Stage 2 as set out in the Tidworth CATP (CATP.15). The 2012 Strategic Housing Land Availability Assessment (SHLAA) (SHLAA2012.17⁵) estimated development capacities following the methodology explained in the September 2011 SHLAA

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

² [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

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

⁴ [\[CATP.15\]](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Tidworth, July 2018

⁵ [\[SHLAA2012.17\]](#) SHLAA 2012 - Appendix 3 - Warminster

Methodology (SHELAA.22)⁶, based on a broad density assumption of 30 dwellings per hectare, with deductions made where high level 'exclusionary criteria' would affect the developability of the site.

6. In the case of policy H1.1, the capacity of SHLAA site 553 was 188 dwellings⁷, following the removal of land that already benefitted from planning permissions. These were land at Granby Gardens (PH.04⁸) which is under construction, and outline planning permission for 109 dwellings on part of the site adjoining Empress Way (PH.05⁹).
7. Through Stages 3 and 4 of the site assessment process, as explained in the Tidworth CATP (CATP.15¹⁰), further detailed analysis of site constraints and infrastructure requirements was carried out. Following these assessments, it was concluded that due to limited capacity within the local primary school, the number of dwellings to be allocated (including the 109 dwellings already permitted) should be limited to approximately 270 dwellings overall. As vehicular access/egress off Empress Way had been established through the outline planning permission for 109-dwellings, it was considered that the area benefitting from planning permission should be included within the developable area to create a single comprehensive site allocations. The benefits of taking this approach include the delivery of a single, comprehensive development scheme capable of utilising a primary access point from Empress Way.
8. An area of the site (1.8ha) is set aside for the future construction of a primary school as this has been identified as a likely future need as a result of the proposed development using up all available capacity at the existing school. These considerations are summarised in the Tidworth CATP (CATP.15) (Appendix F, p49) and subsequent assessment (Appendix G, p51). Key infrastructure requirements are identified for the site at paragraph 5.19 and 5.20 of the WHSAP (WHSAP.01.01¹¹ and EXAM.01.01¹²).
9. Furthermore, paragraph 5.19 of the WHSAP (WHSAP.01.01), as amended by Proposed Change PC41 (EXAM.01.01), sets out that a Transport Assessment will be required, to determine the trigger point for the delivery of the access via Simonds Road and inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge. This matter was assessed in detail by all parties as part of a recent planning application on the site, which was subsequently dismissed at appeal. The applicants for the dismissed appeal site provided a Transport Assessment that provided a basis for the assessment of highways and transport matters, including the road link, by planning conditions and obligations. This matter is discussed at paragraphs 26 and 27 of the s.78 Appeal decision APP/Y3940/W/17/3181886 (PH.13)¹³, and is deemed to be satisfactory.

⁶ [\[SHELAA.22\]](#) Strategic Housing Land Availability Assessment – Methodology, September 2011

⁷ [\[CATP.15\]](#) Tidworth CATP (CATP.15) contains errors at pages 15, 40, 48 and 51 stating an incorrect residual SHLAA capacity for site 553. This should be 188, not 179.

⁸ [\[PH.04\]](#) Planning Permission 1406522FUL - Granby Gardens

⁹ [\[PH.05\]](#) Planning Permission E20130234OUT - Empress Way

¹⁰ [\[CATP.15\]](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Tidworth, July 2018

¹¹ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

¹² [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

¹³ [\[PH.13\]](#) Appeal dismissed 1610907OUT - Land at Empress Way Ludgershall

10. Up to 270 dwellings on this site would exceed the indicative requirement for housing growth for Tidworth and Ludgershall, as set out in the WCS. However, the level of development proposed on this site is not considered likely to undermine the spatial strategy for the local area, as discussed in Topic Paper 4 (TOP.04B)¹⁴.
11. Further details relating to infrastructure requirements will be confirmed through the planning application process, in accordance with the WCS (WCO.01)¹⁵ Core Policy 3 and available evidence at the time of submission.

Issue 5.3 - What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated:

i. biodiversity, in particular but not restricted to European protected habitats and species

12. The Council considers that any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
13. The Sustainability Appraisal (SA) for this site (SA.01A.7)¹⁶ was informed by a settlement level Habitats Regulations Assessment (HRA.01)¹⁷ which concluded that the relationship of the site with River Avon Special Area of Conservation (SAC) and the Salisbury Plain Special Protection Area (SPA) could generate likely significant effects and required further assessment. Subsequently the Council produced an Addendum under the Habitats Regulations (HRA.02)¹⁸, and a further Addendum (HRA.02a)¹⁹ to support the Council's Schedule of Proposed Changes, which provided the further assessment that was required for both matters.
14. Regarding the likely significant effects of phosphate discharge into the River Avon SAC additional wording, as agreed by the Environment Agency and Natural England, has been inserted into the Plan to provide greater certainty over the need to provide for phosphate neutral development for an interim period. This reflects a Memorandum of Understanding (HRA.03)²⁰ which has informed Proposed Change 35 (PC35) to paragraph 5.4 of the WHSAP (EXAM.01.01)²¹. This is discussed in more detail the Council's response to Issue 5.11.
15. Regarding the likely significant effects of visitor pressure on the Salisbury Plain SPA, the Addendum under the Habitats Regulations (HRA.02) confirms that the Council has updated the HRA and Mitigation Strategy for Salisbury Plain SPA (HRA.04)²² to take account of the latest visitor survey results and Stone Curlew monitoring, and there are

¹⁴ [\[TOP.04B\]](#) Topic Paper 4: Developing Plan Proposals Addendum – Submission draft plan, May 2018

¹⁵ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

¹⁶ [\[SA.01A.7\]](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A7, May 2018

¹⁷ [\[HRA.01\]](#) Wiltshire Housing Site Allocations Plan Habitats Regulations Assessment Pre Submission, June 2017

¹⁸ [\[HRA.02\]](#) Addendum to Wiltshire Housing Site Allocations Plan Pre-Submission Assessment under the Habitats Regulations, May 2018

¹⁹ [\[HRA.02.a\]](#) Addendum to Wiltshire Housing Site Allocations Plan Pre-Submission Assessment under the Habitats Regulations Minor Factual Update to support the consultation on the Council's Schedule of Proposed Changes, September 2018

²⁰ [\[HRA.03\]](#) Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

²¹ [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

²² [\[HRA.04\]](#) HRA and Mitigation Strategy for Salisbury Plain SPA, January 2015

no recommendations for changes to policies or supporting text in the Plan in respect of these matters.

16. Additional biodiversity aspects at the site were assessed at pages 3 -4 of the SA – Annex 1: A.7 Tidworth & Ludgershall (SA.01A.7), summarised in the Tidworth CATP (CATP.15)²³ at Appendix F, p49, and Appendix G, p51. The assessment concluded that development would need to include protection measures and enhancement of local habitats, due to the presence of BAP Priority Habitat hedgerows at the site boundaries and a need to incorporate additional planting throughout the development in order to increase habitat connectivity and diversity. Such matters are considered to be captured within the scope of Core Policy 50 of the WCS (WCO.01)²⁴, and it is expected that this would be addressed through the submission of an ecological assessment as part of any future planning application. The policy and supporting text will ensure that the proposals are landscape-led which will also support the biodiversity objectives.

ii. green infrastructure and agricultural land

17. The Council considers that preservation of green infrastructure and agricultural land have been adequately considered through the site selection process, and that neither matter presents a reason to preclude development on this site.

18. Green infrastructure and agricultural land were assessed through the SA – Annex 1: Tidworth & Ludgershall (SA.01A.7)²⁵ at pages 5, 12, 13 and 14.

19. In relation to green infrastructure, it was concluded that the site is of a size that it would be possible to incorporate necessary green infrastructure within the site, as set out in the policy H1.1 and supporting text at paragraph 5.21, as amended by PC44 (EXAM.01.01)²⁶. It is considered that mitigation measures are possible and there is no evidence to indicate that the site should not be allocated.

20. In relation to agricultural land, the site is comprised of agricultural land but there is data that can be relied on to determine the Grade of this land. The council are of the view that a minor loss can be justified by the benefits of developing housing on the site. In addition, the site promoters have prepared an illustrative masterplan (XXXX) which shows land that may be required for a 1.8-hectare 2FE primary school could be positioned at the south-east corner of the allocation site. The need for the school would be reassessed at the time of a subsequent planning application, and if it is found that the school is no longer needed the land would remain available for agricultural use, or to revert to agricultural use should it not be required within the period.

iii. landscape quality and character

21. Wiltshire Council considers that protection of landscape quality and character has been central to the site assessment that has led to the proposed allocation of this site.

22. Landscape aspects were assessed through the SA – Annex 1: Tidworth & Ludgershall (SA.01A.7) at pages 12-14 and subsequent assessment at Stage 4 of the Tidworth

²³ [\[CATP.15\]](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Tidworth, July 2018

²⁴ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

²⁵ [\[SA.01A.7\]](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A7, May 2018

²⁶ [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

CATP (CATP.15) at Appendix G, page 53. Mitigation measures are suggested which include incorporating landscape-scale planting along southern and eastern boundaries and providing open space and green infrastructure through the site, as set out in the policy H1.1 and supporting text at paragraph 5.21.

iv. heritage assets

23. Heritage is assessed through the SA – Annex 1: Tidworth & Ludgershall (SA.01A.7)²⁷ at pages 11-12 with subsequent assessment at Stage 4 of the Tidworth CATP (CATP.15)²⁸ at Appendix G, page 54. Due to the size of the site and recorded archaeology in the area, an archaeological assessment should be carried out to inform assessment. There were otherwise no other potential impacts on heritage assets. There is no evidence to indicate that the site should not be allocated as per the proposed site area.

v. strategic and local infrastructure including transport

24. The Council considers that the policy, its supporting text, and the requirements set by the WCS (WCO.01)²⁹ and national guidance is sufficient to ensure that the site can come forward with due regard to strategic and local infrastructure needs. This matter has been considered to some degree in Issue 5.2.

25. The requirement to consider strategic and local infrastructure requirements is set by Core Policy 3 of the WCS (WCO.01), underpinned by the Infrastructure Delivery Plan 3 (WCO.07P)³⁰ setting out key infrastructure that development will contribute towards over the WCS plan period. Core Policy 3 provides a sound basis for ensuring that development sites provide for essential and place-shaping infrastructure that is necessary to support it.

26. In addition, strategic and local infrastructure aspects are assessed through the SA – Annex 1: Tidworth & Ludgershall (SA.01A.7) at pages 15-17 with subsequent assessment at Stage 4, as set out in the Tidworth CATP (CATP.15) Appendix G, page 54. Mitigation measures are suggested.

27. The assessment identifies that there is current and planned capacity at local primary schools sufficient to accommodate development. However, it is likely that development of this site would take up all remaining capacity and the result would also be quite a substantial area of recent and planned development without a local primary school in the immediate vicinity. It would therefore be prudent to retain 1.8 ha of land within an allocation and reserve it for a possible further new primary school. Policy H1.1 provides for this, and a proposed change (PC42) is proposed to paragraph 5.20 of the WHSAP (EXAM.01.01)³¹ in the event that land for a school is not required. Secondary school expansion (Wellington Academy) would be necessary to accommodate the development and is considered achievable.

²⁷ [\[SA.01A.7\]](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A7, May 2018

²⁸ [\[CATP.15\]](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Tidworth, July 2018

²⁹ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

³⁰ [\[WCO.07P\]](#) Wiltshire Infrastructure Delivery Plan 3 2011 – 2026 Appendix 1: Tidworth Community Area, December 2016

³¹ [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

28. Potential impacts were identified at Stage 4 of the CATP site assessment (CATP.15), at Appendix 4, p55, in relation to congestion at Memorial Junction in the town and this is considered to be capable of consideration through a subsequent Transport Assessment to be submitted alongside a future planning application, as set out in paragraph 5.19 of the WHSAP (EXAM.01.01).
29. Potential impacts were also highlights regarding the capacity of the signals on the railway bridge, which again is considered capable of being addressed through a subsequent Transport Assessment.
30. Foul water drainage infrastructure is likely to need upgrading in order to accommodate this development. A proposed change (PC40) has been made to paragraph 5.21 of the WHSAP (EXAM.01.01)³² to ensure that the development will be connected to the nearest point of adequate capacity in the sewerage network.

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

31. The efficient operation of the transport network and highway safety were assessed in Stage 4 of the site selection process and a number of considerations were highlighted, including the need to provide a safe and suitable access onto Empress Way and a connecting link road through new development at Granby Gardens to New Drove. This requirement is included in policy H1.1 and addresses the need to avoid exacerbation of congestion in the town and the need to contribute to infrastructure improvements at the town. Transport assessment will inform details of mitigation measures impacts on the local road network, including the A342 Andover Road, Memorial Road Junction, as set out in the supporting text. In addition, text is proposed to paragraph 5.19 (PC41), to clarify how timing of the access point will be determined, as set out in the Schedule of Proposed Changes (EXAM.01.01). As set out under Issue 5.2, this matter was assessed in detail by all parties as part of a planning application on the site, which was subsequently dismissed at appeal. The applicants for the dismissed appeal provided a Transport Assessment that provided a basis for the assessment of highways and transport matters, including the road link, by planning conditions and obligations. This matter is discussed at paragraphs 26 and 27 of the s.78 Appeal decision (PH.13³³), and is deemed to be satisfactory.

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

32. Air and water quality, noise pollution, odour impact, land stability, groundwater and flood risk are assessed through the SA – Annex 1: Tidworth and Ludgershall (SA.01A.7)³⁴ and through subsequent consideration at Stage 4 of the site assessment process, as set out in the Tidworth and Ludgershall CATP, Appendix G (CATP.15)³⁵.
33. In relation to water quality, and the potential for phosphate discharge into the River Avon SAC, additional wording has been inserted into the Plan to provide greater certainty over the need to provide for phosphate neutral development (see response to Issue 5.3 i above). This is discussed in more detail the council's response to Issue 5.11.

³² [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focused Consultation Document, September 2018

³³ [\[PH.13\]](#) Appeal dismissed 1610907OUT - Land at Empress Way Ludgershall

³⁴ [\[SA.01A.7\]](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A7, May 2018

³⁵ [\[CATP.15\]](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Tidworth, July 2018

34. Regarding air quality, the SA concludes that local air quality is likely to be affected through increases in local commuter traffic. The council considers that mitigation measures in line with national and local plan policy, including Core Policy 55 of the WCS (WCO.01)³⁶, are achievable on this site.
35. With reference to noise pollution, the SA states the adjacent railway line is a potential source of noise however due to the infrequent use of the line, the effects are considered to be negligible.
36. Development of the site may lead to some short term noise, light pollution, odour and vibration associated with the construction phase. The council consider that mitigation measures to limit such impacts are achievable in line with national planning policy, local plan policy and advice from relevant bodies.
37. With reference to odour pollution, the site is in proximity to a sewage works and after this issue was raised through pre-submission consultation on the Plan, a change was proposed to the supporting text of policy H1.1 to address the issue (PC40) as set out in the Schedule of Proposed Changes (EXAM.01.01)³⁷. It is understood that the developer is commissioning odour impact assessment work. The council considers that the site can be delivered, with mitigation where appropriate to address any odour impact issues.
38. In light of the requirements of the NPPF (NPP.01A)³⁸ in relation to land stability, there are no known issues of concern in relation to this site.
39. Regarding ground water and flood risk, the SA sets out that the site falls within Flood Zone 1. However, due to the size of the site a Flood Risk Assessment (FRA) will be required and it is proposed that text is added to supporting text, at paragraph 5.21, (as requested by the Environment Agency) to ensure that the layout of the development is informed by a FRA that takes account of the predicted effects of climate change, and a drainage strategy (PC44), as set out in the Schedule of Proposed Changes (EXAM.01.01).

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

40. Open space, recreational facilities and public rights of way are assessed through the SA – Annex 1: Tidworth and Ludgershall (SA.01A.7)³⁹.
41. The SA states that development of the site offers potential to deliver green infrastructure through provision of open space, connections to and retention of existing footpath networks and green corridors. Paragraph 5.18 of the WHSAP (WHSAP.01.01)⁴⁰ sets out how landscaping and green infrastructure will be incorporated on site. This is supported by the existing green infrastructure requirements set out in WCS Core Policy 52 (WCO.01)⁴¹. Additional text is proposed to be added to policy H1.1 (PC43) to ensure the retention of existing public rights of way through the site, as set out in the Schedule of Proposed Changes (EXAM.01.01).

³⁶ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

³⁷ [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focused Consultation Document, September 2018

³⁸ [\[NPP.01A\]](#) National Planning Policy Framework (NPPF) March 2012

³⁹ [\[SA.01A.7\]](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A7, May 2018

⁴⁰ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁴¹ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

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

42. Wiltshire Council considers that the WHSAP contains effective safeguards or mitigation measures necessary to achieve an acceptable form of development.
43. Policy H1.1 and the supporting text provides contextual detail which will guide future developers and decision makers, and inform mitigation measures that may be required. The requirement for a masterplan will ensure that the site is developed comprehensively. In addition, paragraphs 5.1-5.12 explain how the site will be developed in accordance with existing policies set out in the Wiltshire Core Strategy (WCO.01)⁴², such that there are already effective safeguards to ensuring acceptable forms of development are to be delivered.

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

44. Policy H1.1 and its supporting text set out necessary highways infrastructure requirements and this has been informed through consultation with Wiltshire Council Highways Team. Paragraph 5.19 of the supporting text is proposed to be amended to include more detail in relation to timing of delivery, as set out at PC41 of the Schedule of Proposed Changes (EXAM.01.01⁴³).
45. As addressed under Issue 5.2 the Policy requires 1.8ha land to be reserved for a potential primary school. The potential need for a primary school has arisen through consultation with the council's education team, as described in the Tidworth CATP (CATP.15)⁴⁴ (Appendix F, p49) and subsequent assessment (Appendix G, p51). The need for the school will be kept under review and reassessed at the time of subsequent planning applications.
46. The Policy also requires development of the site to include a strong landscape framework including significant screening to the southern and eastern boundaries of the site. This landscape infrastructure will be critical to avoiding a hard urban edge being formed to the south and east, particularly on the south east corner of the site where there are existing long views. This is explained in the Tidworth CATP (Appendix G, p53) (CATP.15).
47. As discussed above in 5.4(v) there is a likely need to upgrade sewer infrastructure in order to accommodate development at this site. A proposed change to supporting text (PC40) will ensure clarity on water infrastructure, throughout the planning application process, in consultation with the service provider.
48. In addition, S106 contributions will be sought through the planning application process to address added pressures on local services. This will contribute towards delivering additional capacity, where necessary.

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

⁴³ [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁴⁴ [\[CATP.15\]](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Tidworth, July 2018

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

49. The proposed allocation site is assessed through the SA – Annex 1: Tidworth and Ludgershall (SA.01A.7)⁴⁵ and through subsequent consideration at Stage 4 of the site assessment process, set out in the Tidworth and Ludgershall CATP, Appendix G (CATP.15)⁴⁶. The site assessments explain that the site is in an edge of town location and that the site is within 1km of services and facilities at the market town of Ludgershall. Vehicular and pedestrian access to the site could be taken from Empress Way and New Drove via the Granby Gardens site. A detailed layout should also involve a link road connecting these two points in order to provide a safer, dual access to all new homes. While residents are likely to use private vehicles, there are existing pedestrian routes from the site and there are opportunities through the planning application stages to ensure that development of the site incorporates infrastructure to improve cycling routes and storage in accordance with WCS Core Policy 60. In addition, there are bus stops close to the site serving a reasonably regular route, and therefore future residents could make sustainable transport choices that would support the efficient operation of the transport network. Bus stops are located on Andover Road, and would be accessed via a railway crossing. Evidence prepared by the site promoter indicates that there would be no material impact on the operation of the crossing (REP.01⁴⁷). Furthermore, a proposed change (PC43) to the wording of Policy H1.1 of the WHSAP (WHSAP.01.01)⁴⁸ ensures that sufficient weight is given to public rights of way, by requiring the retention and enhancement of public rights of way LUDG1, LUDG2 and LUDG34 through the development of the site.

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

50. The submission version of the WHSAP (WHSAP.01.01) explains at paragraph 5.12 that allocations are proposed at some settlements that involve a mix of uses or site specific complexities and where it is more appropriate for development to be guided by a master plan approach, as opposed to detailed matters being addressed through policy criteria. There are five sites, of which this site is one, that have been identified as requiring a master plan.

51. The remaining sites are allocated by Policies H2 and H3. Due to their less complex nature, these sites were not considered to require a master planned approach, and thus do not have a specific policy. The supporting text to the allocated sites provides future developers and decision makers with important contextual information regarding matters that will need to be addressed through the planning application process. Indeed, as set out Chapter 5 of the WHSAP (WHSAP.01.01), the Council anticipates that development proposals relating to all allocations will be guided by relevant policies of the Wiltshire Core Strategy (WCO.01⁴⁹).

⁴⁵ [\[SA.01A.7\]](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A7, May 2018

⁴⁶ [\[CATP.15\]](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Tidworth, July 2018

⁴⁷ [\[Rep.01\]](#) Transport Technical Note concerning pedestrian use of Berry's Crossing

⁴⁸ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁴⁹ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

52. The Council considers that the specific requirements for each allocation within the WHSAP can effectively be delivered as drafted through a combination of policies and supporting text that will all be read in conjunction with the WCS.

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

53. The proposed allocation is formed by land identified within Wiltshire Council's Strategic Housing Land Availability Assessment (SHLAA) (SHELAA2012.14)⁵⁰, under site reference 533. The council confirms that through assessment of the site and correspondence with the landowner, the site is 'deliverable' (in line with the NPPF definition (NPP.01A⁵¹)).

Issue 5.11 - Is it realistic to expect development within the River Avon catchment to be 'phosphate neutral'? What is the status of the Nutrient Management Plan referred to in the Memorandum of Understanding (HRA.03)? Does the WHSAP provide an effective mechanism for this to be delivered?

54. It is realistic to expect development to be 'phosphate neutral', as instigated by the Environment Agency (EA) and Natural England (NE). Working with these agencies and Wessex Water, alongside other planning authorities in the catchment, measures have been identified in an Interim Delivery Plan (HRA.05.01⁵², HRA.05.02⁵³, HRA.05.03⁵⁴, HRA.05.04⁵⁵) that can deliver mitigation measures sufficient to make a reduction in phosphate at least equivalent to the forecast additional load from all development in the catchment. Importantly, these measures will, however, only be necessary as a contingency to a commitment from Wessex Water to peg phosphate levels at recent average levels (one of Company's Business Plan Outcome Delivery Incentives). The latter largely achieves phosphate neutrality of itself. The EA and NE therefore have realistic expectations.
55. The SAC Nutrient Management Plan (NMP) (BIO.19⁵⁶) was produced in April 2015 to help manage and reduce phosphorous levels, in order to support the conservation objectives of the SAC and facilitate growth in such a way as to avoid any deterioration and achieve compliance with the Habitats Regulations. The NMP (BIO.19) therefore established that development can occur as outlined in the Wiltshire Core Strategy (WCO.01⁵⁷) in a way that was consistent with Habitats Regulations.
56. The role of the NMP (BIO.19) has been supplemented by an Interim Delivery Plan (HRA.05.01 - HRA.05.04) and Wessex Water Outcome Delivery Incentive (see above) as means to achieve phosphate neutrality. These instruments became necessary when, since preparation of the NMP (BIO.19), it became apparent, that reductions to levels of phosphate to the SAC, relying in large part on voluntary improvements to farming practice, were not being achieved to the extent intended by the NMP (BIO.19).

⁵⁰ [\[SHELAA2012.14\]](#) SHELAA

⁵¹ [\[NPP.01A\]](#) National Planning Policy Framework (NPPF), March 2012

⁵² [\[HRA 05.01\]](#) River Avon SAC - Phosphate IDP (Main Report)

⁵³ [\[HRA 05.02\]](#) River Avon SAC - Phosphate IDP (App A Figs 1-16)

⁵⁴ [\[HRA 05.03\]](#) River Avon SAC - Phosphate IDP (App A Figs 17-40)

⁵⁵ [\[HRA 05.04\]](#) River Avon SAC - Phosphate IDP (App B)

⁵⁶ [\[BIO.19\]](#) River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁵⁷ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

57. The WHSAP (WHSAP.01.01⁵⁸ and EXAM.01.01⁵⁹) will be delivered alongside the Interim Delivery Plan (HRA.05.01⁶⁰, HRA.05.02⁶¹, HRA.05.03⁶², HRA.05.04⁶³) and Outcome Delivery Incentive. Housing development proposed within the WHSAP (WHSAP.01.01⁶⁴ and EXAM.01.01) is accounted for within overall forecast development, both residential and non-residential, on which both the Interim Delivery Plan (HRA.05.01 - HRA.05.04) and Outcome Delivery Incentive are based. The main source of funding for off-site mitigation is from the Community Infrastructure Levy, as specified on the Council Regulation 123 list. The Memorandum of Understanding (HRA.03⁶⁵) makes clear that on large schemes the Council will seek on site mitigation measures to help mitigate the effects of development. The Interim Delivery Plan (HRA.05.01 - HRA.05.04) describes on-site measures that can be explored. Individual WHSAP (WHSAP.01.01 and EXAM.01.01) proposals are not at a level of detail for it to be sensible to prescribe measures as part of a proposal; nor might this allow sufficient flexibility even if they were. The general principle as a foundation for the approach already exists in WCS (WCO.01⁶⁶) Core Policy 3.

Issue 5.13 - For Site H1.1, is the operation of the ‘triggers’ for transport and education improvements sufficiently clear and effective? What effect would the need to carry out an odour assessment have on delivery?

58. Paragraph 5.19 of the WHSAP (EXAM.01.01)⁶⁷, as amended by PC41, sets out that a Transport Assessment will be required, to determine the trigger point for the delivery of the access via Simonds Road and inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge. As set out in response to Issue 5.2 this matter was assessed as part of a planning application on the site for 269 dwellings, which was subsequently dismissed at appeal. The applicants for the dismissed appeal provided a Transport Assessment that provided a basis for the assessment of highways and transport matters, including the road link, by planning conditions and obligations. This matter is discussed at paragraphs 26 and 27 of the s.78 Appeal decision (PH.13⁶⁸), and is deemed to be a satisfactory solution that will be acceptable to the Council in highways terms.

59. The appeal also considered education triggers, and it was agreed that there will likely be a need for a 1.8-hectare site for a 2FE primary school over the life of the Plan, which would need to be reassessed at the time of any subsequent planning application. The site promoters have prepared an illustrative masterplan (REP.02⁶⁹) which shows how a 2FE primary school 1.8-hectare site could be positioned and

⁵⁸ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁵⁹ [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁶⁰ [\[HRA.05.01\]](#) River Avon SAC - Phosphate IDP (Main Report)

⁶¹ [\[HRA.05.02\]](#) River Avon SAC - Phosphate IDP (App A Figs 1-16)

⁶² [\[HRA.05.03\]](#) River Avon SAC - Phosphate IDP (App A Figs 17-40)

⁶³ [\[HRA.05.04\]](#) River Avon SAC - Phosphate IDP (App B)

⁶⁴ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁶⁵ [\[HRA.03\]](#) Memorandum of Understanding - River Avon Special Area of Conservation Phosphate Neutral Development - Interim Mitigation

⁶⁶ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

⁶⁷ [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁶⁸ [\[PH.13\]](#) Appeal dismissed 1610907OUT - Land at Empress Way Ludgershall

⁶⁹ [\[REP.02\]](#) Illustrative masterplan to show potential location for a primary school

safeguarded at the south-east corner of the allocation site (freehold land). A set out at PC42 (EXAM.01.01⁷⁰) the Plan specifies that in the event that land for a school is not required within a period to be agreed with the Council's Education Department, then the land will be returned and thereby revert to agricultural use.

⁷⁰ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018