

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H2.10 Barbers Farm, Chapmanslade

PS/M3/41

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Matter 3: Housing Site Allocations
H2.10 Barters Farm, Chapmanslade

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

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

1. Yes, Wiltshire Council considers that allocation H2.10 and its supporting text provides sufficient detail on form, scale, access and quantity of development.
2. Allocation H2.10, on paragraphs 5.102 to 5.103, of the Wiltshire Housing Site Allocations Plan (WHSAP.01.01)¹ provides an overview of the form and scale of development that is expected to be delivered on the site. The quantity of development to be delivered is approximately 35 dwellings, with vehicular access is to be taken from Cleyhill Gardens. Wiltshire Council considers that the level of detail provided within the Wiltshire Housing Site Allocations Plan (WHSAP.01.01) is sufficient, given that there are already policies concerning appropriate form, scale and access set out in the Wiltshire Core Strategy (WCO.01)² that will be used to determine future planning applications on the site. Highway access details have been considered for the site. Further consideration of access arrangements would be undertaken through any planning application and required transport assessment.
3. There are two current planning applications for development of this site, both submitted by Lochailort planning agents, [18/00311/FUL](#) and [18/06223/FUL](#).
4. Application [18/00311/FUL](#) proposes 39 dwellings of two, three, four and five bedroom homes, 30% of which would be affordable. The application also proposes associated works, landscaping, open space with access off Cleyhill Gardens. The latest progress appears to date from October 2018 when an ecological survey was submitted by the applicant/agent following the submission of revised plans.
5. Application [18/06223/FUL](#) proposes 43 dwellings comprising mixed sized homes of two, three and four bedroom houses and bungalows, 30% of which would be affordable. The site would be accessed off Cleyhill Gardens. Associated works, open space and landscaping are also proposed. Progress to date shows the application is very near completion, currently awaiting a S106 Agreement.

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

6. The Strategic Housing and Economic Land Availability Assessment (SHELAA) site capacity, using the SHLAA Methodology September 2011 (SHLAA.22)³, was estimated at 32 dwellings for this site, as set out in Appendix 5.18 Warminster Community Area of the SHELAA (SHLAA2012.17)⁴, which formed a starting point for assessment using 30 dwellings per hectare and applying a multiplier to reduce the developable area to allow for non-housing uses.

¹ [\[WHSAP.01.01\]](#) Wiltshire Council – Wiltshire Housing Site Allocations Plan, July 2018

² [\[WCO.01\]](#) Wiltshire Council – Wiltshire Core Strategy, January 2015

³ [\[SHELAA 22\]](#) Wiltshire Council – SHLAA Methodology, September 2011

⁴ [\[SHLAA2012.17\]](#) SHLAA 2012 - Appendix 3 - Warminster

7. Stage 2 of the Wiltshire Housing Site Allocations Plan site assessment process, as set out in Appendix B of the Warminster Community Area Topic Paper (CATP.18a)⁵, then considered whether exclusionary criteria (such as Flood Zones 2/3) should result in a reduction of the SHLAA site capacity. Stages 3 and 4 undertook further detailed assessments into site constraints and infrastructure requirements. In the case of H2.10, the site capacity was increased from 32 to 35 dwellings because it was considered at Stage 4 that the site could accommodate a marginal increase in capacity whilst still ensuring that this delivery could be met with suitable mitigation measures to protect site constraints and infrastructure requirements. It was recognised that there was a need to preserve the amenity of adjoining residents, adjacent heritage assets and other landscape, surface water flooding issues and biodiversity measures.
8. The key infrastructure requirements for this site relate to upgrades to water supply and foul drainage connections, as detailed on pages 157-58 of the Warminster Community Area Topic Paper (CATP.18a). The local primary school was almost at capacity and further expansion unlikely; therefore, it was only possible for the school to sustain limited growth in pupil numbers. In light of these requirements and site constraints, the size of the development would need to be limited to 35 dwellings.

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

9. A settlement level Habitats Regulations Assessment (HRA.01)⁶ was carried out to inform the preparation of the Plan. It concluded that this site is within the core buffer area of the Bath and Bradford on Avon Bats SAC. The site was considered to have potential for bat roosts, especially the existing buildings associated with the use of the site as well as surrounding trees, whilst hedgerows would provide foraging habitat. Therefore, it was recognised that further assessment would be required at the planning application stage (pages 3-4 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10⁷)).
10. The Addendum to the Habitats Regulations Assessment May 2018 – Factual Update – September 2018 (HRA.02a)⁸, which sets out the changes that occurred following the pre-submission Habitats Regulations Assessment (HRA.01), shows that the site was now included in the calculations of residents living within 6.4km of the Salisbury Plain Special Protection Area. Consequently Site H2.10 was screened into the assessment to identify the potential effects on the Salisbury Plain Special Protection Area. As set out in paragraph 3.1 of the Addendum to the Habitats Regulations Assessment May 2018 – Factual Update –September 2018 (HRA.02a), it was found that whilst inclusion of the site would increase recreational pressure on the SPA, this was not considered significant.

⁵ [\[CATP.18a\]](#) Wiltshire Council - Warminster Community Area Topic Paper, September 2018

⁶ [\[HRA.01\]](#) Wiltshire Council – Habitats Regulations Assessment, June 2017

⁷ [\[SA.01A.10\]](#) Wiltshire Council – Sustainability Appraisal Report: Warminster Community Area, May 2018

⁸ [\[HRA.02a\]](#) Wiltshire Council – Addendum to the Habitats Regulations Assessment, September 2018

ii. green infrastructure and agricultural land

11. Green infrastructure aspects were assessed on pages 3-4 and 13-15 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10)⁹ and, subsequently, at Stage 4 of the site selection process, as set out in Appendix G, on pages 156-158, of the Warminster Community Area Topic Paper (CATP.18a)¹⁰. Mitigation measures were suggested to incorporate green infrastructure into any subsequent development proposals. Since Site H2.10 is at the rural fringe of the village, the allocation would need to incorporate trees to filter views to and from the site. It was considered that mitigation is possible.
12. Agricultural land is discussed on pages 4-5 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10). It was considered that although this is a brownfield site, given its use as a nursery it could potentially include some quality of agricultural land. The evidence suggests that any loss of agricultural land is minor to negligible given the sites reasonably small size and previously-developed use.
13. Paragraphs 17, bullet point eight, 89, bullet point six and 111 of the National Planning Policy Framework, published March 2012, (NPP.01A)¹¹ encourage the appropriate re-use of previously-developed or brownfield land as an effective use of land reducing the need for development of greenfield sites, thus a more sustainable form of development.

iii. landscape quality and character

14. Landscape aspects were assessed on pages 13-15 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10) and mitigation measures suggested to include additional planting to help screen the site and improve views to and from the site, particularly along the sites northern boundary.
15. A public right of way skirts the northern boundary of the site. This should be incorporated within green space corridors, as set out on pages 14-15 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10) and in Appendix G, page 157, of the Warminster Community Area Topic Paper (CATP.18a).
16. It is considered that mitigation measures are possible and that additional planting would enhance the important rural fringe setting of this site.

iv. heritage assets

17. Heritage aspects were assessed, as set out on pages 12-13 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10). The evidence shows that there are several listed buildings within close proximity to the site; therefore a heritage impact assessment is required at the planning application stage. It is considered that there is potential to mitigate any impacts.

⁹ [\[SA.01A.10\]](#) Wiltshire Council – Sustainability Appraisal Report: Warminster Community Area, May 2018

¹⁰ [\[CATP.18a\]](#) Wiltshire Council - Warminster Community Area Topic Paper, September 2018

¹¹ [\[NPP.01A\]](#) National Planning Policy Framework, March 2012

18. The evidence also suggests that the site has some archaeological potential and would therefore need to be assessed. This issue would be dealt with at the planning application stage.

v. strategic and local infrastructure including transport

19. Strategic and local infrastructure aspects were assessed on pages 6-7 and 11-12 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10)¹² and, subsequently, at Stage 4 of the site selection process, as set out in Appendix G, pages 157-158, of the Warminster Community Area Topic Paper (CATP.18a)¹³. Mitigation measures were suggested for any subsequent development proposals.

20. Development at this site would result in the need to mitigate pressure on health facilities. The assessment also identified that whilst the local primary school is forecast to remain nearly at capacity, limited growth in pupil numbers is possible. However, this limits the scale of the future development, thus site capacity is recommended to be approximately 35 dwellings. The secondary school has capacity but may need to be expanded. Contributions towards education provision would likely be required and dealt with at the planning application stage.

21. The evidence indicates that the site is located within Flood Zone 1 therefore a flood risk assessment is required at the planning application stage. There is potential for surface water flooding, however it is considered that this could be successfully mitigated through preventative measures. Water drainage and supply infrastructure upgrades would need to be informed by the relevant assessments and incorporated into the proposals.

22. It is considered that mitigation measures are possible and there is no evidence to indicate that the site should not be allocated.

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

23. The efficient operations of the transport network and highway safety were considerations in Stage 4 of the site selection process and there is no evidence to indicate that the site should not be allocated. Each site has been assessed against an assessment which considered the following factors:

- accessibility to local bus services, rail stations and service centres
- likely impacts on the local road network
- site access arrangements and impacts.

24. Vehicular and pedestrian access would appear to be achievable from Cleyhill Gardens with the potential to extend pedestrian connectivity through the site and into the surrounding area.

25. Development would potentially result in improvements to the public rights of way network thereby improving connectivity within the village and wider area.

¹² [\[SA.01A.10\]](#) Wiltshire Council – Sustainability Appraisal Report: Warminster Community Area, May 2018

¹³ [\[CATP.18a\]](#) Wiltshire Council - Warminster Community Area Topic Paper, September 2018

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

26. Air and water quality, noise pollution, odours, groundwater and flood risk were all considered, as set out on pages 6-10 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10)¹⁴. Specific constraints were identified for this site, which include surface water flooding. Mitigation measures relating to the choice of water management techniques are relevant and considered to be achievable for the site, however potential impacts of increased water abstraction throughout the local catchment area need to be assessed further. This can be achieved at the planning application stage.
27. The site is located on previously developed land and therefore there is potential for contamination. Screening for contamination of land potential would be required at the planning application stage and any contamination mitigated accordingly.
28. In light of the requirements of the National Planning Policy Framework, published March 2012, (NPP.01A)¹⁵ in relation to land stability, there are no known issues of concern in relation to this site.
29. Air quality, noise, odours and vibration associated with construction as well as any impacts caused by or affecting the residential use have also been considered and the effects identified could be fully mitigated through application of existing policy and regulations. Mitigation measures to limit the impacts of vehicular movements would need to be developed and implemented in accordance with local plan policy and advice from relevant bodies.

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

30. The provision, protection and enhancement of open space, recreational facilities and public rights of way have been assessed on pages 13-15 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10). Development would be required to deliver open space, appropriate to its size.
31. There is one public right of way skirting the northern boundary of the site (CHAP14). The evidence suggests that there is potential for this to be improved through development of the site, as set out on page 36 of the Schedule of Proposed Changes - Consultation Document September 2018 (EXAM.01.01)¹⁶.
32. Development of the site is considered to be able to contribute to the protection and enhancement of the existing public rights of way network, open spaces and common land, as appropriate.

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?

33. The supporting text to the allocation provides contextual detail to guide future developers and decision makers and inform mitigation measures as required. Paragraphs 5.102-5.103 of the Wiltshire Housing Site Allocations Plan (WHSAP.01.01)¹⁷ explain how the site will be developed in accordance with existing

¹⁴ [SA.01A.10] Wiltshire Council – Sustainability Appraisal Report: Warminster Community Area, May 2018

¹⁵ [NPP.01A] National Planning Policy Framework, March 2012

¹⁶ [EXAM.01.01] Wiltshire Council – Schedule of Proposed Changes, September 2018

¹⁷ [WHSAP.01.01] Wiltshire Council – Wiltshire Housing Site Allocations Plan, July 2018

policies set out in the Wiltshire Core Strategy (WCO.01)¹⁸ which are existing effective safeguards to ensure acceptable forms of development are 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?

34. Paragraph 5.103 of the Wiltshire Housing Site Allocations Plan (WHSAP.01.01)¹⁹ refers to the need for a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy, as detailed on page 36 of the Schedule of Proposed Changes September 2018 (EXAM.01.01)²⁰. These would be required at the planning application stage. Further capacity assessment of foul and in particular storm water and surface water drainage connections are also required as detailed on pages 6-7 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10)²¹. Other infrastructure considerations have been identified and, as set out in paragraphs 5.102-5.103 of the Wiltshire Housing Site Allocations Plan (WHSAP.01.01), provisions are made in existing policy to ensure that appropriate improvements and contributions are sought through the planning application process.
35. Pages 16-18 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10) identified the need for development at Chapmanslade to contribute to health facilities and school provision to meet the needs of new development. The details are documented on pages 156-158 of the Warminster Community Area Topic Paper (CATP.18a)²². As set out in paragraph 5.1 of the Wiltshire Housing Site Allocations Plan (WHSAP.01.01), Core Policy 3 in the Wiltshire Core Strategy (WCP.01) provides for appropriate infrastructure to be delivered. Requirements for infrastructure contributions will be subject to review through the consideration of future planning applications submitted on the site.

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?

36. The site has been assessed in relation to its accessibility to local bus services, rail stations and service centres. The site is considered to be in a location that is within walking and cycling distance of the services and facilities of Chapmanslade. However, as set out on pages 18-19 of the Sustainability Appraisal Report: Warminster Community Area Remainder (SA.01A.10), the evidence suggests residents would likely be reliant on the use of private vehicle.
37. There is no pedestrian crossing in the village. The above evidence suggests that a crossing may be necessary as a result of the development of the site. The site is in walking distance of bus stops that serve the villages and towns further afield.
38. While residents are likely to use private vehicles, there are opportunities through the planning application process to ensure that development of the site incorporates infrastructure to improve cycling opportunities (such as garages, sheds and secure

¹⁸ [\[WCO.01\]](#) Wiltshire Council – Wiltshire Core Strategy, January 2015

¹⁹ [\[WHSAP.01.01\]](#) Wiltshire Council – Wiltshire Housing Site Allocations Plan, July 2018

²⁰ [\[EXAM.01.01\]](#) Wiltshire Council – Schedule of Proposed Changes, September 2018

²¹ [\[SA.01A.10\]](#) Wiltshire Council – Sustainability Appraisal Report: Warminster Community Area, May 2018

²² [\[CATP.18a\]](#) Wiltshire Council - Warminster Community Area Topic Paper, September 2018

bike stands) in accordance with Core Policy 60 of the Wiltshire Core Strategy (WCO.01)²³.

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?

39. The submission version of the Wiltshire Housing Site Allocations Plan (WHSAP.01.01)²⁴ 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.
40. 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 Wiltshire Housing Site Allocations Plan (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.01).
41. In conclusion, the Council considers that the specific requirements for each allocation within the Wiltshire Housing Site Allocations Plan can effectively be delivered as drafted through a combination of policies and supporting text that will all be read in conjunction with the Wiltshire Core Strategy.

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

42. The Strategic Housing and Economic Land Availability Assessment (SHELAA) (SHELAA.19)²⁵ indicates that the land is 'deliverable', i.e. that the land is available now with a realistic prospect of being viably developed for housing within five years. The more detailed assessment carried out through the Wiltshire Housing Site Allocations Plan (WHSAP.01.01) site selection process has considered a full range of constraints and it has concluded that development is likely to be deliverable within a 5-year timescale. This position has been confirmed by the developer, on page 1774 of Appendix Q – Schedule of Representations to the Consultation Statement Regulation 22 (1) (c) (WHSAP.12)²⁶.

²³ [\[WCO.01\]](#) Wiltshire Council – Wiltshire Core Strategy, January 2015

²⁴ [\[WHSAP.01.01\]](#) Wiltshire Council – Wiltshire Housing Site Allocations Plan, July 2018

²⁵ [\[SHELAA.19\]](#) Wiltshire Council – Appendix 5.18 Warminster Community Area of the SHELAA, August 2017

²⁶ [\[WHSAP.12\]](#) Wiltshire Council – Appendix Q of the Regulation 22(1)(c) Consultation Statement, July 2018