

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H2.11 The Street, Hullavington

PS/M3/42

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Matter 3: Housing Site Allocations

H2.11 The Street, Hullavington

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 H2 and H2.11 of the Wiltshire Housing Site Allocations Plan (WHSAP) Submission Document (WHSAP.01.01)¹ and supporting text incorporating the Council's Schedule of Proposed Changes (EXAM.01.01)², when read in conjunction with the introductory supporting text in Chapter 5 of the Plan (paragraphs 5.1 to 5.12) provide sufficient detail. The introductory text to Chapter 5 clarifies that 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.
2. The quantity of development to be delivered is established in policy through the Schedule of Proposed Changes (EXAM.01.01) as being approximately 50 dwellings on a site area of approximately 3.81ha which is considered to be achievable for the site.
3. Therefore, when read as 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?

4. The Council considers that the amount of development proposed for the site (approximately 50 dwellings) is justified by the evidence base (TOP.02⁴, CATP.04a⁵, SA.01A.3.a⁶) and has had full regard to site specific constraints including: education, landscape, biodiversity, odour quality and historic environment.
5. In the light of identified constraints, detailed assessments were undertaken to determine an appropriate scale of development. This was documented in the site selection process. The conclusions are reported in the Chippenham Community Area Topic Paper CATP (Appendices D, F and G) (CATP.04a).
6. The SHELAA (2011 Methodology) (SHELAA.22)⁷ site capacity was estimated at 86 dwellings for this site (SHLAA 2012 Chippenham Appendix) (SHLAA2012.04)⁸, 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 Housing Site Allocations Plan, July 2018

² [\[EXAM.01.01\]](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

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

⁴ [\[TOP.02\]](#) Topic Paper 2: Site Selection Process Methodology – Submission version, July 2018

⁵ [\[CATP.04a\]](#) Chippenham Community Area Topic Paper, September 2018

⁶ [\[SA.01A.3.a\]](#) Sustainability Appraisal Report Annex 1 - A.3 Chippenham Community Area Remainder – revised, September 2018

⁷ [\[SHELAA.22\]](#) SHLAA Methodology - Sept 2011

⁸ [\[SHLAA2012.04\]](#) SHLAA 2012 Appendix-3 Chippenham, July 2013

7. Stage 2 of the WHSAP site assessment process then considered whether exclusionary criteria should result in a reduction of the SHLAA site capacity. In the case of H2.11, the site capacity was not reduced (Chippenham CATP, Table D.3 page 51) (CATP.04a)⁹.
8. The amount of development proposed at this site was further reduced due to constraints identified through the Sustainability Appraisal, (24 - 42) (SA.01A.3.a)¹⁰ and subsequent assessment Chippenham CATP (Appendix F, p74 - 75 and Appendix G, pages 97 - 99) (CATP.04a).
9. This was primarily due to the impacts on landscape and the visual impact of the site on the wider landscape, provision of sufficient stand-off relating to the Gauze Brook and provision of land to allow for land for the future expansion of the village primary school. In light of these overlapping constraints the capacity of the site was reduced further to 50 dwellings.
10. Other key infrastructure requirements are identified in the plan, policy H2.11 which includes provision of land for expansion to the adjacent primary school and works to improve the highway junction, Chippenham CATP (Appendix G, Table G.4, p97 - 98) (CATP.04a). Key infrastructure requirements are identified in the plan, for this particular site, on page 90 of Chippenham CATP (CATP.04a).
11. In addition, an assessment of the capacities of Hullavington's Sewage Treatment Works (STW) will be required to be undertaken by the applicant and any identified upgrades required to support the development of the site will need to be provided, which is considered achievable (Sustainability Appraisal, pages 62-64) (SA.01A.3.a).
12. All forms of necessary infrastructure requirements associated with the development of The Street, Hullavington site will be confirmed through the planning application process according to up to date evidence at the time of submission in line with WCS Core Policy 3 (WCO.01)¹¹.

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

13. Any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
14. Biodiversity aspects were assessed through the Sustainability Appraisal (page 24) (SA.01A.3.a) and summarised in Chippenham Community Area Topic Paper (Appendix F, Table F.5, p74 and Appendix G, Table G.4, p99) (CATP.04a). The assessment concluded that development may need to include protection measures and enhancement of local habitats, due to the presence of BAP Priority species¹² within the site.
15. When read as whole, alongside the policies of the WCS, the Council considers that the provisions of Policy H2.11 and associated supporting text, are capable of ensuring that

⁹ [CATP.04a](#) Chippenham Community Area Topic Paper, September 2019

¹⁰ [SA.01A.3.a](#) Sustainability Appraisal Report Annex 1 - A.3 Chippenham Community Area Remainder, Revised September 2018

¹¹ [WCO.01](#) Wiltshire Core Strategy, January 2015

¹² BAP Species or habitats

all necessary infrastructure requirements associated with protecting and enhancing biodiversity will be delivered. Moreover, all infrastructure requirements associated with the development of the The Street, Hullavington will be confirmed through any subsequent planning application process in line with up-to-date evidence at the time of submission.

ii. green infrastructure and agricultural land

16. Green infrastructure aspects were assessed through the Sustainability Appraisal (pages 35 -37) (SA.01A.3.a)¹³ and subsequent assessment at Stage 4 (Chippenham CATP, Appendix G, p99) (CATP.04a)¹⁴ and mitigation measures were suggested to incorporate green infrastructure into any subsequent development proposals.
17. The Sustainability Appraisal (pages 35 - 36) (SA.01A.3.a) states that development of the site offers potential to contribute towards the delivery of a comprehensive green infrastructure. Any future planning application will also be considered in the context of requirements set out in WCS Core Policy 52 (WCO.01)¹⁵.
18. Agricultural land was considered and evaluated in the Sustainability Appraisal (page 27) (SA.01A.3.a) on the basis of available evidence. The appraisals concluded that the impact of developing the site was considered to be minor to negligible in scale.

iii. landscape quality and character

19. Landscape considerations were assessed through the Sustainability Appraisal (pages 35-36) (SA.01A.3.a) and subsequent assessment at Stage 4 (Chippenham CATP, Appendix G, p97-98 (CATP.04a)). Further landscape evidence can be found in the TEP Landscape Assessment report (pages 20 – 22) (PSCON.11A)¹⁶.
20. Mitigation measures were recommended which included reducing the developable area of the site, specifically through substantial landscaping along the north and western boundaries to mitigate the visual impact on the wider landscape. It is considered that mitigation measures are possible and subsequently the area of the site was reduced to the proposed area of the allocation.
21. In conclusion, it is considered that mitigation measures to address landscape quality and character are deliverable and capable of being fully addressed through landscape assessment informing development proposals and submitted as part of a planning application, in line with WCS Core Policy 51 (WCO.01).

iv. heritage assets

22. Heritage aspects were assessed through the Sustainability Appraisal (pages 33-24) (SA.01A.3.a) and subsequent assessment at Stage 4 (Chippenham CATP, Appendix G, p98) (CATP.04a). This identified the historic church footpath running diagonally across the site which should be retained and incorporated into any subsequent site layout, Chippenham CATP (Appendix G, Table G.4, p99) (CATP.04a)¹⁷.

¹³ [SA.01A.3.a](#) Sustainability Appraisal Report Annex 1 - A.3 Chippenham Community Area Remainder, Revised September 2018

¹⁴ [CATP.04a](#) Chippenham Community Area Topic Paper, September 2018

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

¹⁶ [PSCON.11A](#) Stage 4a Site Landscape Assessment Part 1: Amesbury, Chippenham, Devizes and Malmesbury Community Areas - Pre-submission draft plan, June 2017

¹⁷ [CATP.04a](#) Chippenham Community Area Topic Paper, September 2018

23. The need to retain the historic footpath is referenced in paragraph 5.107 (WHSAP.01.01)¹⁸. Any future planning application will also be considered in the context of requirements set out in WCS Core Policy 58 (WCO.01)¹⁹.

v. strategic and local infrastructure including transport

24. The requirement to consider strategic and local infrastructure requirements is set by WCS Core Policy 3 (WCO.01) and identified within Policy H2.11 and the supporting text paragraphs 5.104 to 5.107. Core Policy 3 (WCO.01) provides a sound and suitable approach to ensuring that the development of The Street, Hullavington will provide for essential and place-shaping infrastructure where it is needed in a timely manner.
25. Strategic and local infrastructure requirements were assessed through the Sustainability Appraisal (pages 38-40) (SA.01A.3.a)²⁰ and subsequent assessment at Stage 4 (Chippenham CATP, Appendix G, p98) (CATP.04a) and mitigation measures were identified for development proposals.
26. In terms of site specific related infrastructure, development at this site would result in the need to mitigate pressure on educational facilities, sewerage and transport/highways improvements:
- The scheme will provide land to expand the local primary school to meet future local needs as well as being necessary to serve pupils from the development itself. In addition to the land provided, funding contributions will also be sought to help secure construction of the school expansion (Sustainability Appraisal page 39) ((SA.01A.3.a).
 - Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company/Lead Local Flood Authority (Sustainability Appraisal pages 31- 32) (SA.01A.3.a).
 - Paragraph 5.106 of the WHSAP also sets out the highway improvements expected to be required to make development acceptable (Sustainability Appraisal Table G.4 page 98) (SA.01A.3.a).
27. The Council considers that existing policy will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3 (WCO.01)²¹.

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

28. The efficient operation of the transport network and highway safety were considerations in Stage 4 of the site selection process, and any concerns have been presented in the Chippenham CATP (Appendix G, Table G.4 pages 98-99) (CATP.04a)²².

¹⁸ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

¹⁹ [WCO.01](#) Wiltshire Core Strategy, January 2015

²⁰ [SA.01A.3.a](#) Sustainability Appraisal Report Annex 1 - A.3 Chippenham Community Area Remainder, Revised September 2018

²¹ [WCO.01](#) Wiltshire Core Strategy, January 2015

²² [CATP.04a](#) Chippenham Community Area Topic Paper, September 2018

29. The Chippenham CATP identified that there were potential impacts on the highway network and improvements to the existing junction layout and visibility plays associated with The Street / Norton Road junction would be required. This requirement is set out in paragraph 5.106 of the WHSAP (WHSAP.01.01)²³.

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

30. The CATP Appendix G (page 90-91) (CATP.04a) and the Sustainability Appraisal (pages 26 – 33) (SA.01A.3.a)²⁴ have identified wider considerations and constraints for groundwater, air quality, noise and lighting, sustainable drainage and soakaways. All these issues would be to be positively addressed in order to support any subsequent planning applications.
31. With specific regard to air quality, the Sustainability Appraisal (pages 29 - 30) (SA.01A.3.a) concludes that local air quality is likely to be affected through increases in vehicular emissions. The council considers that mitigation measures in line with national and local plan policy, including WCS Core Policy 55 (WCO.01) and Air Quality Strategy (WCO.23)²⁵, are achievable on this site.
32. In light of the requirements of the NPPF (NPP.01A)²⁶ in relation to land stability, there are no known issues of concern in relation to this site.
33. Noise and odours have been considered (Sustainability Appraisal, pages 29 - 30) (SA.01A.3.a) and the effects identified can be mitigated in accordance with local plan policy and regulations.
34. Recognising the need to address flood risk, drainage and ground water protection, paragraph 5.107, as amended by PC87 (EXAM.01.01)²⁷, of the WHSAP (WHSAP.01.01) requires that developments be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and a comprehensive Drainage Strategy to help inform matters such as layout and design.

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

35. The provision, protection and enhancement of open space, recreational facilities and public rights of way have been assessed through the Sustainability Appraisal (p35-36) (SA.01A.3.a)²⁸ and subsequent assessment at Stage 4 as set out in the Chippenham CATP (page 97 - 99) (CATP.04a)²⁹.
36. In relation to public rights of way, the development of the site will need to retain the historic footpath through the site to the surrounding countryside and footpaths within the site should be retained and improved (paragraph 5.107 WHSAP) (WHSAP.01.01)³⁰. The site can contribute to the protection and enhancement of the

²³ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

²⁴ [SA.01A.3.a](#) Sustainability Appraisal Report Annex 1 - A.3 Chippenham Community Area Remainder - Revised September 2018

²⁵ [WCO.23](#) Air Quality Action Plan for Wiltshire, June 2015

²⁶ [NPP.01A](#) National Planning Policy Framework, 2012

²⁷ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

²⁸ [SA.01A.3.a](#) Sustainability Appraisal Report Annex 1 - A.3 Chippenham Community Area Remainder - Revised September 2018

²⁹ [CATP.04a](#) Chippenham Community Area Topic Paper, September 2018

³⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

existing open spaces and common land, as appropriate.

37. Development of the site offers positive benefits associated with the opportunity to deliver green infrastructure through provision of open space, connections to and retention of existing footpath networks and green corridors. This is supported by the existing green infrastructure requirements set out in WCS Core Policy 52 (WCO.01)³¹.

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?

38. Chapter 5 of the Plan, policy H2.11 along with supporting text are considered to provide contextual detail that will guide future developers and decision makers and thereby inform mitigation measures required to support development. The site will also be developed in accordance with existing policies set out in the Wiltshire Core Strategy (WCO.01), such that there are already effective safeguards to ensuring acceptable forms of development are to be delivered.
39. The Plan contains effective mitigation mechanisms through Policy H2.11 and paragraph 5.104 (WHSAP.01.01) that contributions that land will be provide for the primary school extension and contributions will be sought from development of the site to secure funding contributions towards local school capacity.
40. The Council considers that existing policy will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3 (WCO.01).
41. Chapter 5 of the Plan including Policies H2 and H2.11 and their supporting text are considered to provide contextual detail that will guide future developers and decision makers and thereby inform mitigation measures required to support development. Reference is made to the need to develop proposals in accordance with existing policies set out in the Wiltshire Core Strategy also, such that there are already effective safeguards to ensuring acceptable forms of development are to be delivered.
42. The Proposed Changes (PC86 and PC87) (EXAM.01.01)³² to the supporting text of the WHSAP provide further clarity for the user of the Plan by reinforcing the definition of mitigation considered necessary to ensure development will achieve an acceptable form of development.

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?

43. WHSAP (WHSAP.01.01³³ and EXAM.01.01)³⁴ paragraphs 5.1 – 5.12 introduce a range of generic requirements that may be required for each site. Paragraphs 5.1 states that *'development will be required to provide for the necessary on-site and, where necessary, off-site infrastructure requirements arising from proposals in accordance with [WCS] Core Policy 3 (Infrastructure requirements)'*.
44. Requirements for infrastructure contributions will be subject to review through the consideration of future planning applications submitted on the site. It is considered that

³¹ [WCO.01](#) Wiltshire Core Strategy, January 2015

³² [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

³³ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan (July 2018)

³⁴ [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

contributions specified for this site are necessary and justified by the evidence base and the plan is clear on how and when infrastructure will be provided.

45. WHSAP (WHSAP.01.01 and EXAM/01.01) Policy H2.11 and paragraph 5.104 – 5.107 set out the various strategic and local infrastructure requirements for this site, all of which are considered to be achievable and justified by the evidence base.
46. There is no item of critical infrastructure needed in order to support development on the site.
47. In terms of site specific related infrastructure, development at this site will result in the need to provide mitigation to address impacts in relation to ecology and Barberry carpet moth paragraph 5.107 of the WHSAP (WHSAP.01.01) (Sustainability Appraisal pages 24 – 26) (SA.01A.3.a)³⁵. Policy H2.11 and paragraph 5.104 and 5.105 clearly states that 0.2ha of land will be provided for primary school expansion and contributions will be sought from development the site to secure funding contributions towards local school capacity (Sustainability Appraisal pages 39) (SA.01A.3.a) (CATP pages 97 and 114) (CATP.04a)³⁶. These requirements are founded on evidence gathered through the plan making process and are therefore considered to be justified and necessary.
48. The Council considers that existing the planning application process will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3 (WCO.01)³⁷.

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 accessibility of the proposed allocation was appraised through the SHLAA, site 690, assessed through the Sustainability Appraisal and at Stage 4 of the site assessment process. The site assessment (Sustainability Appraisal page 40) (SA.01A.3.a) explains that the site is on the periphery of the settlement, but within walking distance of the local primary school, post office/food shop, public house, village hall, church and bus stop.
50. The site is closely related to the village and is within walking distance of the services and facilities within the settlement. The types of facilities found in higher order settlements such as Chippenham mean that overall residents are still likely to rely upon use of the private car (Sustainability Appraisal, page 40) (SA.01A.3.a)³⁸.
51. The WHSAP (para 5.107) (WHSAP.01.01)³⁹ also makes provision for the existing footpaths to be retained and improved as part of the development of the site.
52. While residents are likely to use private vehicles, there are existing bus stops on The Street serving Chippenham and Malmesbury that offer regular connections throughout the day (Sustainability Appraisal, page 40) (SA.01A.3.a). In addition, opportunities will

³⁵ [SA.01A.3.a](#) Sustainability Appraisal Report Annex 1 - A.3 Chippenham Community Area Remainder - revised September 2018

³⁶ [CATP.04a](#) Chippenham Community Area Topic Paper, September 2018

³⁷ [\[WCO.01\]](#) Wiltshire Core Strategy, January 2015

³⁸ [SA.01A.3.a](#) Sustainability Appraisal Report Annex 1 - A.3 Chippenham Community Area Remainder - revised September 2018

³⁹ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

be explored through the planning application process (e.g. the Transport Assessment and Design and Access Statement) to ensure that development of the site incorporates infrastructure to improve cycling opportunities (such as garages, sheds and secure bike stands) in accordance with WCS Core Policy 60 (WCO.01)⁴⁰.

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?

53. 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.
54. 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.01).
55. In conclusion, 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?

56. Yes. The Council considers the proposed allocation can be delivered within five years. This position has been confirmed by the developer through representations received to consultations on the WHSAP where they have stated it can be delivered in the short-medium term.
57. The site allocation is also supported by the local community and is the only site allocation being proposed within the Hullavington Neighbourhood Plan.

⁴⁰ [WCO.01](#) Wiltshire Core Strategy, January 2015