

# **Wiltshire Housing Site Allocations Plan Examination in Public**

## **Position Statement on Matter 3**

### **Housing Site Allocations**

**H2.12 East of Farrells Field, Yatton Keynell**

PS/M3/45

**March 2019**

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## **Matter 3: Housing Site Allocations**

### **H2.12 Yatton Keynell**

#### **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. Policy H2 and paragraphs 5.108 – 5.110 of the Wiltshire Housing Site Allocations Plan Submission Document (WHSAP.01.01)<sup>1</sup> and supporting text, incorporating the Council's Schedule of Proposed Changes (EXAM.01.01)<sup>2</sup>, 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)<sup>3</sup> 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 the draft Plan as being approximately 30 dwellings on a site area of approximately 1.2ha (PC88) (EXAM.01.01) which is considered to be achievable for the site.
3. Specific details about access at paragraph 5.110 of WHSAP (WHSAP.01.01) have been removed PC91 (EXAM.01.01) to respond to concerns from the local community in relation to an alternative access option.
4. Therefore, 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?**

5. The Council considers that the amount of development proposed for the site (approximately 30 dwellings) is justified by the evidence base (TOP.02<sup>4</sup>, CATP.04a<sup>5</sup>, SA.01A.3.a<sup>6</sup>) and has had full regard to site specific constraints including: biodiversity and land use.
6. In light of identified constraints, detailed assessments were undertaken to determine 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).
7. The SHLAA (2011 Methodology) (SHELAA.22)<sup>7</sup> site capacity was estimated at 32 dwellings for this site (SHLAA 2012 Chippenham Appendix) (SHLAA2012/04)<sup>8</sup>, which

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<sup>1</sup> [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

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

<sup>3</sup> [WCO.01](#) Wiltshire Core Strategy

<sup>4</sup> [TOP.02](#) WHSAP Topic Paper 2 - Site Selection Process Methodology July 2018 Submission version

<sup>5</sup> [CATP.04a](#) Wiltshire Housing Site Allocations Plan: Community Area Topic Paper - Chippenham Community Area Remainder July 2018 Submission Version Updated September 2018

<sup>6</sup> [SA.01A.3.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I - Revised A.3 Chippenham Community Area Remainder - Revised September 2018

<sup>7</sup> [SHELAA.22](#) SHLAA Methodology - Sept 2011

<sup>8</sup> [SHLAA2012/04](#) SHLAA 2012 Appendix-3 Chippenham

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.

8. 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 H2.12, the site capacity was reduced from 32 to 31 dwellings due to an adjustment due to a slightly mapping overlap.
9. The amount of development proposed at this site remained unchanged from this amount through the assessment process (Chippenham CATP (Appendix G, p113) (CATP/04a)<sup>9</sup>.
10. Infrastructure requirements for this site were considered to be achievable. There is a government oil pipeline that crosses the site and consideration will need to be given to safeguard its route and maintenance access when considering the layout of the site (Sustainability Appraisal pages 164 – 165) (SA.01A.3.a)<sup>10</sup> (Chippenham CATP page 113) (CATP/04a).
11. All forms of necessary infrastructure requirements associated with the development of the land East of Farrells Field 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)<sup>11</sup>.

**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. Any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.
13. Biodiversity aspects were assessed through the Sustainability Appraisal (page 163 - 164) (SA/01A.3a), summarised in Chippenham CATP (Appendix F, Table F.13, p85 and Appendix G, Table G.9, p112) (CATP/04a). Following Pre-submission consultation (rep no 2670) the woodland corridor along the western boundary of the site has been removed and therefore there are no known biodiversity factors of concern for this site (Proposed Change PC90) (EXAM.01.01)<sup>12</sup>.
14. However it is expected that any unidentified concerns would be addressed through the submission of an ecological assessment as part of any future planning application, and captured within the scope of WCS Core Policy 50 (WCO.01).

**ii. green infrastructure and agricultural land**

15. Green infrastructure aspects were assessed through the Sustainability Appraisal (page 173) (SA/01A.3a) and subsequent assessment at Stage 4 (Chippenham CATP, Appendix G, p113) (CATP/04a) and mitigation measures were suggested to incorporate green infrastructure into development proposals.

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<sup>9</sup> [CATP.04a](#) Wiltshire Housing Site Allocations Plan: Community Area Topic Paper - Chippenham Community Area Remainder July 2018 Submission Version Updated September 2018

<sup>10</sup> [SA.01A.3.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I - Revised A.3 Chippenham Community Area Remainder - Revised September 2018

<sup>11</sup> [WCO.01](#) Wiltshire Core Strategy

<sup>12</sup> [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

16. The Sustainability Appraisal (pages 172 – 174) (SA/01A.3a)<sup>13</sup> states that development of the site offers potential to contribute towards the delivery of a comprehensive network of green infrastructure. Development proposals will be considered in the context of requirements set out in WCS Core Policy 52 (WCO/01)<sup>14</sup>.
17. Agricultural land was considered and evaluated in the Sustainability Appraisal (page 165) (SA/01A.3a). The appraisals concluded that the impact of developing the site was minor to negligible in scale.

### **iii. landscape quality and character**

18. Landscape aspects were assessed through the Sustainability Appraisal (pages 172-174) (SA/01A.3a) and subsequent assessment at Stage 4 (Chippenham CATP, Appendix G, Table G.10, p114) (CATP/04a)<sup>15</sup>. Further landscape evidence can be found in the TEP Landscape Assessment report pages 28 – 30 (PSCON/11A)<sup>16</sup>.
19. The assessments conclude that the site has a moderate – high capacity to change. Retention of the existing boundary vegetation on site would provide screening to reduce the effect on adjacent visual receptors and be in keeping with landscape character. The effect on landscape character conforms to the settlement pattern due to its level of enclosure.
20. The WHSAP (WHSAP.01.01)<sup>17</sup> recognises in paragraph 5.108 that much of the settlement of Yatton Keynell is within the Cotswold Area of Outstanding Natural Beauty (AONB) and that development would need to avoid potential harm to be special qualities of the Cotswold AONB.
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 assets were assessed through the Sustainability Appraisal (pages 171-172) (SA/01A.3a) and subsequent assessment at Stage 4 (Chippenham CATP, Appendix G, page 85) (CATP/04a). This identified that the proposed allocation would give rise to no likely negative impacts on the historic environment. Notwithstanding this, any future planning application will be considered in the context of requirements set out in WCS Core Policy 58 (WCO/01).

### **v. strategic and local infrastructure including transport**

23. The requirement to consider strategic and local infrastructure requirements is set by WCS Core Policy 3 (WCO/01)<sup>18</sup> and identified within the supporting text paragraph

<sup>13</sup> [SA.01A.3.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I - Revised A.3 Chippenham Community Area Remainder - Revised September 2018

<sup>14</sup> [WCO.01](#) Wiltshire Core Strategy

<sup>15</sup> [CATP.04a](#) Wiltshire Housing Site Allocations Plan: Community Area Topic Paper - Chippenham Community Area Remainder July 2018 Submission Version Updated September 2018

<sup>16</sup> [PSCON/11A](#) Wiltshire Housing Site Allocations Plan Pre-submission draft plan: Stage 4a Site Landscape Assessment Part 1: Amesbury, Chippenham, Devizes and Malmesbury Community Areas June 2017

<sup>17</sup> [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

<sup>18</sup> [WCO.01](#) Wiltshire Core Strategy

5.110, PC89 (EXAM.01.01)<sup>19</sup>. Core Policy 3 (WCO/01) provides a sound and suitable approach to ensuring that the development of Land East of Farrells Field will provide for essential and place-shaping infrastructure where it is needed in a timely manner.

24. Strategic and local infrastructure requirements were assessed through the Sustainability Appraisal (pages 175 - 178) (SA/01A.3a)<sup>20</sup> and subsequent assessment at Stage 4 (Chippenham CATP, Appendix G, page 91) (CATP/04a)<sup>21</sup> and mitigation measures were suggested for any subsequent development proposals.
25. In terms of site specific related infrastructure, development at this site would result in the need to mitigate pressure on water supply and doctor capacity:
  - The need to assess capacity for water supply and infrastructure upgrades may be required and agreed through dialogue with relevant water utilities (Sustainability Appraisal pages 165 – 167) (SA/01A.3a); and
  - Doctor surgery capacity would need to be assessed in detail and may need addresses through appropriate contributions towards improving doctor's surgery capacity (CATP Appendix G page 91) (CATP/04a).
26. 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)<sup>22</sup>.

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

27. The efficient operation of the transport network and highway safety were considerations in Stage 4 of the site selection process, and any concerns would have been presented in the Chippenham CATP (Appendix G, Table G.9 pages 113) (CATP/04a).
28. Following Pre-submission consultation (rep no 912) the reference to access that would be taken from Farrell Fields has been removed (WHSAP para 5.110) (Proposed Change PC91) (EXAM.01.01).

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

29. The Sustainability Appraisal (pages 167 - 169) (SA/01A.3a) has identified wider considerations and constraints in relation to groundwater, air quality, noise and lighting, sustainable drainage and soakaways. All these issues are considered to be capable of being positively addressed through the development of planning applications.
30. With specific regard to air quality, the Sustainability Appraisal (pages 167 - 169) (SA/01A.3a) 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

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<sup>19</sup> [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report

<sup>20</sup> [SA.01A.3.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I - Revised A.3 Chippenham Community Area Remainder - Revised September 2018

<sup>21</sup> [CATP.04a](#) Wiltshire Housing Site Allocations Plan: Community Area Topic Paper - Chippenham Community Area Remainder July 2018 Submission Version Updated September 2018

<sup>22</sup> [WCO.01](#) Wiltshire Core Strategy

and local plan policy, including WCS Core Policy 55 (WCO/01)<sup>23</sup> and Air Quality Strategy (WCO/23)<sup>24</sup>, are achievable on this site.

31. In light of the requirements of the NPPF (NPP/01A)<sup>25</sup> in relation to land stability, there are no known issues of concern in relation to this site.
32. Noise and odours have been considered (Sustainability Appraisal pages 167 - 169) (SA/01A.3a)<sup>26</sup> and the effects identified can be mitigated in accordance with local plan policy and regulations.
33. Recognising the need to positively address flood risk, drainage and ground water protection, paragraph 5.109 as amended by proposed Change PC89 (EXAM/01/01)<sup>27</sup>, of the WHSAP (WHSAP/01/01)<sup>28</sup> requires that development proposals for the site should be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and a comprehensive Drainage Strategy to ensure that development will result in improved drainage conditions. In addition, as the site lies within Groundwater Protection Zone 2.

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

34. The provision, protection and enhancement of open space, recreational facilities and public rights of way have been assessed through the Sustainability Appraisal (p173-174) (SA/01A.3a) and subsequent assessment at Stage 4 as set out in the Chippenham CATP (pages 885 - 86) (CATP/04a)<sup>29</sup>.
35. The WHSAP (para 5.110) (WHSAP/01/01) states that the possibility to link to adjacent footpaths should be explored (Chippenham CATP pages 177 - 178) (CATP/04a).
36. 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)<sup>30</sup>.

#### **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?**

37. Yes, Wiltshire Council considers that the WHSAP contains effective safeguards or mitigation measures necessary to achieve an acceptable form of development.
38. The supporting text to allocation H2.12 provides contextual detail which will guide future developers and decision makers, and inform mitigation measures that may be required.
39. The Proposed Change PC89 (EXAM.01.01) to the supporting text in the WHSAP (WHSAP.01.01) strengthen mitigation to ensure development will achieve an acceptable

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<sup>23</sup> [WCO.01](#) Wiltshire Core Strategy

<sup>24</sup> [WCO.24](#) Air Quality Strategy for Wiltshire

<sup>25</sup> [NPP.01A](#) National Planning Policy Framework (NPPF) March 2012)

<sup>26</sup> [SA.01A.3.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I - Revised A.3 Chippenham Community Area Remainder - Revised September 2018

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

<sup>28</sup> [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

<sup>29</sup> [CATP.04a](#) Wiltshire Housing Site Allocations Plan: Community Area Topic Paper - Chippenham Community Area Remainder July 2018 Submission Version Updated September 2018

<sup>30</sup> [WCO.01](#) Wiltshire Core Strategy



form of development.

40. The site will be developed in accordance with existing policies set out in the Wiltshire Core Strategy, such that there are already effective safeguards to ensuring acceptable forms of development are to be delivered (paragraphs 5.1 - 5.12, WHSAP) (WSHAP.01.01)<sup>31</sup>.

**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?**

41. WHSAP (WHSAP/01.01 and EXAM/01.01<sup>32</sup>) 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)'*.
42. Requirements for infrastructure contributions will be subject to review through the consideration of future planning applications submitted on the site. It is considered that 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.
43. There is no critical infrastructure necessary to enable the development to proceed.

**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?**

44. The accessibility of the proposed allocation was appraised through the SHLAA (SHLAA2012/04)<sup>33</sup>, site 482, assessed through the Sustainability Appraisal (SA/01A.3a)<sup>34</sup> and at Stage 4 of the site assessment process. The site assessment (pages 177 - 178) (SA/01A.3a) explains that 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.
45. 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, pages 177 - 178) (SA/01A.3a).
46. The WSHAP (para 5.110) (WHSAP.01.01) also seeks, as part of the development of the site, the exploration of linking to adjacent footpaths.
47. While residents are likely to use private vehicles, the site is close to Farrells Field bus stop which serves Chippenham. In addition, opportunities will 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

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<sup>31</sup> [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

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

<sup>33</sup> [SHLAA2012.04](#) SHLAA 2012 Appendix-3 Chippenham

<sup>34</sup> [SA.01A.3.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I - Revised A.3 Chippenham Community Area Remainder - Revised September 2018

cycling opportunities (such as garages, sheds and secure bike stands) in accordance with WCS Core Policy 60 (WCO/01)<sup>35</sup>.

**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?**

48. The submission version of the WHSAP (WHSAP.01.01)<sup>36</sup> 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 that have been identified as requiring a master plan.
49. 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)<sup>37</sup>.
50. 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?**

51. Yes. The Council considers the proposed allocation can be delivered within five years.
52. In February 2019, the site promoters submitted a planning application (application number 19/01490/FUL) (PH/10)<sup>38</sup> for 38 units. It is understood that work has been undertaken considering the consultation of the draft WHSAP (WHSAP.01.01) and the site promoters and parish council have worked together to on the masterplan for the site. This addresses one of the main causes for concern regarding the access to the site and reflects the Proposed Change (PC91) (EXAM.01.01)<sup>39</sup>.

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<sup>35</sup> [WCO.01](#) Wiltshire Core Strategy

<sup>36</sup> [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document July 2018

<sup>37</sup> [WCO.01](#) Wiltshire Core Strategy

<sup>38</sup> [PH.10](#) Planning Application 19/01490/FUL - Land East of Farrells Field, Yatton Keynell (site H2.12)

<sup>39</sup> [EXAM.01.01](#) Schedule of Proposed Changes (Sept 2018) (Part 1 of 46) Main Report