

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H3.3 North of Netherhampton Road

PS/M3/56

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Matter 3: Housing Site Allocations

H3.3 North of Netherhampton Road, Salisbury

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 H3 and the plan's supporting text do provide sufficient detail on form, scale, access and quantity of development for site allocation H3.3.
2. Site allocation H3.3 of the WHSAP (WHSAP.01.01¹ and EXAM.01.01²) and paragraphs 5.143 to 5.145 provide 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 stated as '*approximately 100 dwellings on 5.6ha of land*'.
3. The level of detail provided within the WHSAP (WHSAP.01.01 and EXAM.01.01) is sufficient, given that there are already policies concerning appropriate form, scale and access set out in policies in the Wiltshire Core Strategy (WCO.01³) that will also be used to determine future planning applications on the site. This is clarified in paragraphs 5.1 to 5.12 of the plan e.g. paragraph 5.2 recognises that the design and form of development will need to accord with Core Policy 57 of the Wiltshire Core Strategy.

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. Yes, the amount of development proposed for this site is justified having regard to any constraints and the provision of necessary infrastructure.
5. The quantum of development appropriate for this site was considered through the site selection process (TOP.02⁴), including the Sustainability Appraisal (SA.01.A.a⁵ and SA.01.A6⁶), and the findings are presented in the Salisbury CATP (CATP.13⁷) at Chapter 5 and Appendices D, F and G.
6. Sites that had been assessed through the Strategic Housing Land Availability Assessment (SHLAA2012.19⁸) formed the starting point of further detailed assessment in line with Stage 2 of the Site Selection Methodology (TOP.02), as set out in Appendix D of the Salisbury CATP (CATP.13).
7. The SHLAA site development capacities were estimated following the methodology set out in the September 2011 SHLAA Methodology (SHELAA.22⁹) which formed a

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 [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁵ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁶ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

⁷ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁸ [SHLAA2012.19](#) Strategic Housing Land Availability Assessment Appendix 3 – Wilton, July 2013

⁹ [SHELAA.22](#) Strategic Housing Land Availability Assessment – Methodology, September 2011

starting point for assessment using a density of 30 dwellings per hectare and applying a multiplier to reduce the developable area to allow for non-housing uses.

8. In the case of site allocation H3.3, the capacity of SHLAA site S1027 was 127 dwellings for this site. Stage 2 of the site selection process (TOP.02¹⁰) considered whether any exclusionary criteria should be applied which may result in a reduction of the SHLAA site capacity. For this site, SHLAA site S1027, Appendix D of the Salisbury CATP (CATP.13¹¹) shows that no exclusionary criteria were relevant, and the developable site capacity remained the same at 127 dwellings.
9. Through Stages 3 and 4 of the site selection process (TOP.02), further detailed assessment into site constraints, potential mitigation measures and infrastructure requirements was carried out to establish a realistic, deliverable amount of development for this site. Table G.4 of the Salisbury CATP (CATP.13) lists a number of potential effects of developing this site and mitigation measures – these relate to biodiversity, land use, air quality and environmental pollution, surface water management, heritage, landscape and education. Table G.4 then states that *‘mitigation measures to reduce the likely adverse effects of developing this site are considered to be reasonable and achievable. However, such measures would be likely to reduce the dwelling capacity of the site. In recognition of the need to manage surface water; and include measures to protect heritage assets and biodiversity interests, the capacity of the site would be capable of delivering approximately 100 dwellings’*.
10. The WHSAP (WHSAP.01.01¹² and EXAM.01.01¹³), paragraph 5.128, details three specific considerations that need to be addressed in order for housing development to be accommodated in Salisbury. Further considerations specific to this site are outlined in paragraphs 5.143 to 5.145 and in the Schedule of Proposed Changes (EXAM.01.01) - refs PC104 to and PC106.
11. Details relating to specific infrastructure requirements will be confirmed through the planning application process, in accordance with the Wiltshire Core Strategy (WCO.01¹⁴) and in light of up to date evidence. However, it is considered that approximately 100 dwellings on this site is justified, given the size of the site, acknowledged constraints and infrastructure requirements.

¹⁰ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

¹¹ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

¹² [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

¹³ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

¹⁴ [WCO.01](#) Wiltshire Core Strategy, January 2015

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. Likely effects of developing this site on biodiversity have been assessed in the Sustainability Appraisal Report and Annex I (SA) (SA.01.A.a¹⁵ and SA.01.A6¹⁶), Habitats Regulations Assessment (HRA.01¹⁷, HRA.02¹⁸ and HRA.02.a¹⁹) and in Stage 4a of the site selection process (TOP.02²⁰), presented in the Salisbury CATP Appendix G (CATP.13²¹). These assessments do not indicate that the site should not be allocated due to impacts on biodiversity.
13. The SA Annex I (SA.01.A6) on page 75 evaluated this site as having likely moderate adverse effects on biodiversity. There are no designated or non-designated biodiversity features within or adjacent to this site. However, the HRA screening assessment (HRA.01) identified that development at Salisbury could contribute towards impacts upon the River Avon SAC through increased phosphate loading and habitat loss / damage. This evaluation was given to all sites assessed in Salisbury through the SA because of this issue. The SA assessment of this site is summarised in the Salisbury CATP (CATP.13) in Table F.8.
14. The further addendum (HRA.02a) to the HRA in Chapter 3 provides an update on progress made to date with the development of mitigation strategies. With regards to phosphate impacts on the River Avon SAC, this update states that *'allocations at Warminster, Salisbury and Durrington must demonstrate that they will be phosphate neutral in order to demonstrate there will be no adverse effect from development'*. Paragraph 3.2.4 confirms that *'the Council, Natural England (NE), the Environment Agency (EA), Wessex Water PLC, New Forest District Council, New Forest National Park Authority and Christchurch and East Dorset Council are making constructive progress and have developed a Memorandum of Understanding (MoU) which was finalised to support submission of the Plan'*.
15. The HRA addendum (HRA.02a) concludes that *'an agreed form of wording with the Environment Agency and Natural England has been inserted into the Plan that references the role of the Memorandum of Understanding (HRA.03²²) in order to provide greater certainty over the need to provide for phosphate neutral development'*. This additional wording inserted into the plan is included in the Schedule of Proposed Changes (EXAM.01.01²³) ref PC98 and this will allow phosphate neutral development to take place within the river catchment.
16. This site is currently an arable field used for cereal production. Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13) in Table G.4, confirms that there are no designated or non-designated biodiversity features within or adjacent to the site. It recommends that *'the line of mature trees that lie along the*

¹⁵ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

¹⁶ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, 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 [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

²¹ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

²² [HRA.03](#) Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

²³ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

northern boundary of the site should be retained and protected. Additional hedgerow planting or other habitat creation should be included’.

17. Mitigation measures are considered to be achievable to reduce or avoid any impacts of development on biodiversity.

ii. green infrastructure and agricultural land

18. Likely effects of developing this site on green infrastructure and agricultural land have been assessed in the Sustainability Appraisal (SA.01.A.a²⁴ and SA.01.A6²⁵) and the assessment does not indicate that the site should not be allocated. Minor adverse effects are considered likely against relevant SA objectives that are capable of mitigation.

19. The site is currently an arable field used for cereal production. The SA Annex I (SA.01.A6) on page 76 states that *‘this site contains some BMV agricultural land. Therefore, development of this site may lead to a loss of BMV agricultural land. Notwithstanding this, given the scale of development likely compared to other sites in this area of search such a loss would be minor to negligible. Where possible, development on this site should be located so as to reduce the loss of BMV land’*. This is confirmed in Table G.4 of the Salisbury CATP (CATP.13²⁶).

20. The NPPF (NPP.01)²⁷ (paragraph 112) advises local planning authorities to take into account the economic and other benefits of BMV land. When taking into account the economic and social benefits of developing this site for housing and public open space, the benefits are considered likely to outweigh the loss of the agricultural land.

21. The SA Annex I (SA.01.A6) page 85 also assessed likely effects on green infrastructure and found that the *‘development of the site for housing could offer the potential to deliver green infrastructure’*. It states on page 86 that *‘there would be a requirement for a GI buffer to any mature trees and hedgerows within and adjacent to the site’*.

iii. landscape quality and character

22. Likely effects of developing this site on landscape quality and character have been assessed in the Sustainability Appraisal (SA.01.A.a and SA.01.A6) and in Stage 4a of the site selection process (TOP.02²⁸), presented in the Salisbury CATP (CATP.13). The assessments do not indicate that the site should not be allocated. The SA concludes that landscape impacts from developing this site are likely to be minor adverse overall and capable of mitigation.

23. The SA Annex I (SA.01.A6) states on page 86 that *‘there are no landscape designations in this area. The site is located in a rural fringe setting with low intervisibility. Development of the site would result in the loss of an arable field. Any effects on the landscape are likely to be fairly well contained and linked to the existing site and surroundings’*. The SA also states on page 85 *‘there is no designated open space or common land within the site. There are no Public Rights of Way (PROW’s) within or adjacent to the site’*.

²⁴ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

²⁵ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

²⁶ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

²⁷ [NPP.01](#) National Planning Policy Framework, March 2012

²⁸ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

24. The Landscape Assessment Part 2 (PSCON.11B)²⁹ considered this site in terms of impacts on a number of landscape factors, including landscape character, views, impact assessment and capacity to accommodate change. The assessment notes that *'the site affords views of the Cathedral spire from the western approaches to the city along Netherhampton Road'*. The assessment assesses the Capacity to Accommodate Change as 'moderate-high' and concludes that *'by setting the development back from the road with an open space along Netherhampton Road views of the Cathedral spire from the western approaches to the city can be retained'*.
25. WHSAP (WHSAP.01.01³⁰) paragraph 5.143 states that *'the site is relatively well contained in terms of visual impacts on the wider landscape'*. Paragraph 5.144 has been amended by Schedule of Proposed Changes (EXAM.01.01³¹) ref PC104 and requires that the layout and design of the site would need to give great weight to conserving the significance of the cathedral and *'high quality, sustainable development that enhances an important approach to the City and provides links to nearby rights of way'*.

iv. heritage assets

26. Likely effects of developing this site on heritage assets have been assessed in the Sustainability Appraisal (SA.01.A.a³² and SA.01.A6³³), in Stage 4a of the site selection process (TOP.02³⁴), presented in the Salisbury CATP (CATP.13³⁵) and in a specific Heritage Impact Assessment (WHSAP.05³⁶). The assessments do not indicate that the site should not be allocated due to impacts on heritage assets, and mitigation measures to reduce the likely adverse effects of developing this site are considered to be achievable.
27. The SA Annex I (SA.01.A6) on page 84 considers that, overall, there are likely to be moderate adverse effects on heritage assets. It states on page 84 that *'the site does not fall within or adjacent to any conservation areas/ heritage designations and is not in the vicinity of any listed buildings. However, long views to the cathedral spire are available across the site from the A3094, and at closer range from within the site itself'*. The SA notes that the site has a high archaeological potential and an archaeological assessment would be required in support of any subsequent planning application.
28. The Heritage Impact Assessment (WHSAP.05) of this site has been taken into account in proposed changes to WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.144. Schedule of Proposed Changes (EXAM.01.01) ref PC104 proposes this paragraph is amended to *'Long views to the historic City of Salisbury and Salisbury Conservation Area including the spire of Salisbury Cathedral (Grade I listed) are available across the site from the A3094, and at closer range from within the site itself. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting. Development proposals would need to be sensitively designed to ensure that views of the Spire are not significantly compromised. Design and layout would also need to positively address the objectives of the City of Salisbury Conservation Area Appraisal and Management Plan to minimise harm. Proposals would therefore need to provide for*

²⁹ [PSCON.11B](#) Wiltshire Housing Site Allocations Plan – Stage 4a Site Landscape Assessment Part 2, June 2017

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

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

³² [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

³³ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

³⁴ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

³⁵ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

³⁶ [WHSAP.05](#) Wiltshire Housing Site Allocations Plan Heritage Impact Assessment Final Report, March 2018

high quality, sustainable development that enhances an important approach to the City and provides links to nearby rights of way’.

29. Meetings have been held between the Council, Historic England and the developer with the purpose of agreeing a set of development principles to reduce the risk of harm from developing this site. A series of visualisations, as recommended in paragraph 9.25 of the Heritage Impact Assessment (WHSAP.05³⁷), have been produced by the developer to show ‘before’ and ‘after’ views towards the cathedral spire, as experienced whilst travelling east along the A3094 Netherhampton Road. Currently, discussions are ongoing between the Council, developer and Historic England on this issue and progress will be included in updates to the Statement of Common Ground with Historic England. Notwithstanding the matters currently being discussed, the Council nonetheless considers the allocation to be sound as matters in relation to heritage can be appropriately addressed through appropriate design and layout in accordance with Core Policies 57 and 58 of the Wiltshire Core Strategy (WCO.01)³⁸.

v. strategic and local infrastructure including transport

30. Likely effects of developing this site on strategic and local infrastructure have been assessed in the Sustainability Appraisal (SA.01.A.a³⁹ and SA.01.A6⁴⁰) and in Stage 4a of the site selection process (TOP.02⁴¹), presented in the Salisbury CATP (CATP.13⁴²). The assessments do not indicate that the site should not be allocated.
31. The SA (SA.01.A.a and SA.01.A6) considers that the development of this site is capable of incorporating appropriate waste, water, drainage, sewerage, highways infrastructure and green infrastructure and no significant effects are considered likely.
32. The SA Annex I (SA.01.A6) states on page 87 that *‘on the basis of evidence supplied by the Wiltshire Clinical Commissioning Group (WCCG), all 6 GP surgeries in Salisbury face capacity issues with expected population increase in Salisbury to 2026 and an impact assessment would be required. If this site was developed for housing, mitigation would be required to support additional patient capacity’.*
33. With regards primary school infrastructure, the SA Annex I (SA.01.A6) on page 88 states that *‘the site is in the catchment of Harnham Infant and Junior Schools. Both schools already have a considerable number of mobile classrooms to cope with existing demand and only have a small number of surplus places. The schools are co-located on one site which would not be large enough to permit any further expansion. A site for a new primary school, ideally of at least 1.8ha that could accommodate up to 2 forms of entry (420 pupils), may be required either onsite or in the vicinity of this site for any development to proceed’.* However, the new primary school required through WHSAP (WHSAP.01.01⁴³ and EXAM.01.01⁴⁴) policy H3.1 on the H3.1 Netherhampton Road site opposite this site will meet the primary education needs of this development. WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.145 states *‘in order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. A new primary school on land south of Netherhampton Road would contribute to the new school places needed to serve the area’.*

³⁷ [WHSAP.05](#) Wiltshire Housing Site Allocations Plan Heritage Impact Assessment Final Report, March 2018

³⁸ [WCO.01](#) Wiltshire Core Strategy, January 2015

³⁹ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁴⁰ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

⁴¹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴² [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁴³ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁴⁴ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

34. Regarding transport infrastructure, the SA Annex I (SA.01.A6⁴⁵) on page 89 states that *'development of the site could potentially provide opportunities to improve cycling and walking routes to local services/ facilities/ employment'* and the *'site would have the potential to incorporate new cycling infrastructure as well as create links to existing cycling infrastructure'*. Along the southern side of the A3094 adjacent to this site there is an existing shared-use pedestrian and cycle path serving the adjacent Harnham residential area, Harnham Trading Estate, Harnham Business Park and In-Excess retail store opposite the site, which will allow future residents the opportunity to walk or cycle to use services and facilities within Harnham and the city centre.
35. Stage 4a of the site selection process (TOP.02)⁴⁶, presented in the Salisbury CATP (CATP.13)⁴⁷ states in Table G.4 that *'direct vehicular access would be achieved via the A3094 Netherhampton Road. Impacts of developing this site on the road network through Salisbury would need to be addressed through a detailed Transport Assessment'*. WHSAP (WHSAP.01.01)⁴⁸ paragraph 5.145 has been amended through the Schedule of Proposed Changes (EXAM.01.01)⁴⁹ ref PC106 to include additional wording in this policy as *'transport assessment will be required to support any planning application and provision made for transport network improvements necessary to accommodate the scale of development.'*

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

36. Likely effects of developing this site on the efficient operation of the transport network and highway safety have been assessed in the Sustainability Appraisal (SA.01.A.a⁵⁰ and SA.01.A6⁵¹) and in Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13). The assessments do not indicate that the site should not be allocated.
37. The Salisbury CATP (CATP.13), Table G.2, acknowledges that *'there are ongoing pressures on the highway network through Salisbury with significant congestion at peak times. The Salisbury Transport Strategy Draft Strategy Refresh 2018 has developed measures to accommodate growth and maintain the efficiency of the transport network. This would be developed alongside the assessment and development of site specific measures'*. This is reflected in the WHSAP (WHSAP.01.01), paragraph 5.128, as amended by the Schedule of Proposed Changes (EXAM.01.01) ref PC97, which states *'the refresh of the Salisbury Transport Strategy (2018) has reviewed the effectiveness of existing measures and proposes new ones to accommodate growth. Development will contribute to these wider network measures, where necessary, alongside measures that are implemented expressly as part of specific development proposals'*.
38. The Salisbury CATP (CATP.13), Table G.4, states that *'the city centre is approximately 1.2km to the north. Whilst future residents would be able to access local services and walking routes to the city centre, they are still likely to rely on private vehicles to access a full range of services and facilities in and around the city. However, the number of dwellings anticipated on this site could lead to improved public transport access. Direct vehicular access would be achieved via the A3094 Netherhampton Road. Impacts of*

⁴⁵ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

⁴⁶ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴⁷ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

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

⁴⁹ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁵⁰ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁵¹ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

developing this site on the road network through Salisbury would need to be addressed through a detailed Transport Assessment’.

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

39. Likely effects of developing this site on air and water quality, noise pollution, odours, land stability, groundwater and flood risk have been assessed in the Sustainability Appraisal (SA.01.A.a⁵² and SA.01.A6⁵³) and in Stage 4a of the site selection process (TOP.02)⁵⁴, presented in the Salisbury CATP (CATP.13)⁵⁵. The assessments do not indicate that the site should not be allocated.
40. The SA Annex I (SA.01.A6⁵⁶), pages 75 - 83, has noted likely minor adverse effects from development of this site for these factors that are capable of being mitigated. The site is an arable field with no known contamination issues. The site is located entirely within Flood Zone 1, but adjacent to Flood Zone 2 (for more detail on potential flood risk from development of this site refer to Issue 5.12 below).
41. There are no specific issues related to odour, noise or land stability associated with this site. Adjacent to the site to the east is an existing residential area, with residential and retail development and the A3094 adjacent to the south, and therefore the site is already affected by a degree of noise and light pollution. Development is considered likely to increase local commuter traffic, which may impact on local air quality. Measures will need to be developed and implemented to mitigate vehicular emissions in line with local plan policies and the council’s Air Quality Strategy (WCO.24)⁵⁷.
42. The site falls within the catchment of the Hampshire Avon, a high-risk catchment for phosphate loading (this issue is considered further under Issue 5.11 below).
43. Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13) in Table G.4, states that *‘mitigation measures to reduce the likely adverse effects of developing this site are considered to be reasonable and achievable. However, such measures would be likely to reduce the dwelling capacity of the site’.*

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

44. Likely effects of developing this site on open space, recreational facilities and public rights of way have been assessed in the Sustainability Appraisal (SA.01.A.a and SA.01.A6) and in Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13). The assessments do not indicate that the site should not be allocated. The site is currently an arable field used for cereal production. There is no designated open space or common land within the site and there are no PROW’s within the site. The SA Annex I (SA.01.A6), page 85, states that *‘the development of the site for housing could offer the potential to deliver Green Infrastructure’* and *‘would offer the potential to deliver additional access to and availability of urban greenspaces’.*
45. Along the southern side of the A3094 adjacent to this site there is an existing shared-use pedestrian and cycle path serving the adjacent Harnham residential area, Harnham Trading Estate, Harnham Business Park and In-Excess retail store opposite

⁵² [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁵³ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

⁵⁴ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁵⁵ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁵⁶ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

⁵⁷ [WCO.24](#) Air Quality Strategy for Wiltshire 2011 – 2015, December 2011

the site, which will allow future residents the opportunity to walk or cycle to use services and facilities within Harnham and the city centre.

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?

46. It is considered that the plan does contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development. The supporting text to the site allocation H3.3, paragraphs 5.143 – 5.145, together with amendments proposed in the Schedule of Proposed Changes (EXAM.01.01⁵⁸) ref PC104 – PC106, provide contextual detail which will guide future developers and decision makers and inform mitigation measures that may be required. These measures include addressing the heritage, landscape and primary education issues associated with the site.
47. The site will be developed in accordance with existing policies set out in the Wiltshire Core Strategy (WCO.01⁵⁹), 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?

48. WHSAP (WHSAP.01.01⁶⁰ and EXAM.01.01) paragraphs 5.1 – 5.12 introduce a range of generic infrastructure requirements that may be required for each site. Paragraph 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)'*. 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.
49. WHSAP (WHSAP.01.01) paragraph 5.128, as amended by the Schedule of Proposed Changes (EXAM.01.01) ref PC97, specifically mentions the refresh of the Salisbury Transport Strategy (WHSAP.08⁶¹ and WHSAP.08A⁶²). It states *'transport development inevitably has impacts on the local transport network. The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS'* and *'development will contribute to these wider network measures, where necessary...'*
50. The SA (SA.01.A.a⁶³ and SA.01.A6⁶⁴) considers that the development of this site is capable of incorporating appropriate waste, water, drainage, sewerage, highways infrastructure and green infrastructure and no significant adverse effects are considered likely. WHSAP (WHSAP.01.01) paragraphs 5.143 – 5.145, as amended by the Schedule of Proposed Changes (EXAM.01.01) refs PC104 – PC106, contain specific requirements for the design and layout that is required for development to address the heritage, flood risk, education, health and transport aspects of this site.

⁵⁸ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁵⁹ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁶⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁶¹ [WHSAP.08](#) Salisbury Transport Strategy Draft Strategy Refresh, July 2018

⁶² [WHSAP.08A](#) Salisbury Transport Strategy Summary, June 2018

⁶³ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁶⁴ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

51. With regards primary education provision, Stage 4a of the site selection process (TOP.02⁶⁵), presented in the Salisbury CATP (CATP.13⁶⁶) in Table G.4, states that 'although the site is reasonably close to Harnham Infant and Junior Schools, both schools already have a considerable number of mobile classrooms to cope with existing demand and there is inadequate capacity. Development would lead to a requirement for new education facilities in the local area. The site is too small to justify providing land for a new primary school on site'. Policy H3.1 of WHSAP (WHSAP.01.01⁶⁷ and EXAM.01.01⁶⁸) requires provision of 'at least 1.8ha of land for a two-form entry primary school' on the H3.1 Netherhampton Road site allocation which is opposite this site, and WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.145 states that 'appropriate contributions would be likely to be sought to help fund additional local school capacity'.
52. The SA Annex I (SA.01.A6⁶⁹) states on page 87 that 'on the basis of evidence supplied by the Wiltshire Clinical Commissioning Group (WCCG), all 6 GP surgeries in Salisbury face capacity issues with expected population increase in Salisbury to 2026 and an impact assessment would be required. If this site was developed for housing, mitigation would be required to support additional patient capacity'. WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.145 therefore also states that 'funding contributions may also be sought where needed to increase capacity at local GP surgeries in the city'.

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?

53. The site is considered to be in an accessible location with good access to everyday facilities by a range of means of transport. Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13), states in Table G.4 that 'the city centre is approximately 1.2km to the north. Whilst future residents would be able to access local services and walking routes to the city centre, they are still likely to rely on private vehicles to access a full range of services and facilities in and around the city. However, the number of dwellings anticipated on this site could lead to improved public transport access'.
54. Proposed site allocation H3.1, opposite this site, is required to incorporate a new primary school, local centre, Country Park and land for employment uses. These services and facilities will be available, within walking distance, to residents of the H3.3 site allocation.
55. Currently, bus routes serve the adjacent residential area of Harnham and the nearest bus stop is at Upper Street, approximately 200m from this site. However, with approximately 740 new dwellings in total allocated on this site and the H3.1 Netherhampton Road site allocation opposite, it is considered that existing bus routes can and will be extended to serve these new developments.
56. In terms of walking and cycling accessibility, along the southern side of the A3094 adjacent to this site there is an existing shared-use pedestrian and cycle path serving the adjacent Harnham residential area, Harnham Trading Estate, Harnham Business Park and In-Excess retail store opposite the site, which will allow future residents the

⁶⁵ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁶⁶ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁶⁷ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁶⁸ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁶⁹ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

opportunity to walk or cycle to use services and facilities within Harnham and the city centre.

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?

57. The submission version of the WHSAP (WHSAP.01.01⁷⁰) 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.
58. 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 in 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.01⁷¹).
59. 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?

60. The proposed allocation is considered to be deliverable in the timescales envisaged.
61. This site is identified within Wiltshire Council's 2012 Strategic Housing Land Availability Assessment (SHLAA) (SHLAA2012.19⁷²), under site reference S1027. The assessment states that there are no suitability constraints and that residential development is achievable. The assessment records the availability of the site as 'unknown' and for that reason only states that the site is not deliverable. However, the availability of the site has been confirmed by the landowner and developer (the same landowner/developer as for H3.1 Netherhampton Road site allocation), and it is considered there is a realistic prospect of the site being viably developed for housing within five years. This position has been confirmed by the developer.

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

62. It is considered that the plan will be effective in preserving or enhancing the setting of the Cathedral.
63. The likely effects of developing this site on the setting of the Cathedral have been assessed in the Sustainability Appraisal (SA.01.A.a⁷³ and SA.01.A6⁷⁴), in Stage 4a of

⁷⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁷¹ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁷² [SHLAA2012.19](#) Strategic Housing Land Availability Assessment Appendix 3 – Wilton, July 2013

⁷³ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁷⁴ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

the site selection process (TOP.02⁷⁵), presented in the Salisbury CATP (CATP.13⁷⁶), and in a specific Heritage Impact Assessment (WHSAP.05⁷⁷). The assessments do not indicate that the site should not be allocated due to impacts on the setting of the Cathedral, as mitigation measures to reduce the likely adverse effects of developing this site are considered to be achievable.

64. The Heritage Impact Assessment (WHSAP.05) of this site has been taken into account in proposed changes to WHSAP (WHSAP.01.01⁷⁸) paragraph 5.144. Schedule of Proposed Changes (EXAM.01.01⁷⁹) ref PC104 proposes this paragraph is amended to *'Long views to the historic City of Salisbury and Salisbury Conservation Area including the spire of Salisbury Cathedral (Grade I listed) are available across the site from the A3094, and at closer range from within the site itself. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting. Development proposals would need to be sensitively designed to ensure that views of the Spire are not significantly compromised. Design and layout would also need to positively address the objectives of the City of Salisbury Conservation Area Appraisal and Management Plan to minimise harm. Proposals would therefore need to provide for high quality, sustainable development that enhances an important approach to the City and provides links to nearby rights of way'*.
65. Meetings have been held between the Council, Historic England and the developer with the purpose of agreeing a set of development principles to reduce the risk of harm from developing this site. A series of visualisations, as recommended in paragraph 9.25 of the Heritage Impact Assessment (WHSAP.05), have been produced by the developer to show 'before' and 'after' views towards the cathedral spire, as experienced whilst travelling east along the A3094 Netherhampton Road. Currently, discussions are ongoing between the Council, developer and Historic England on this issue and progress will be included in updates to the Statement of Common Ground with Historic England.

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?

66. 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 (IDP) (HRA.05.01⁸⁰, HRA.05.02⁸¹, HRA.05.03⁸², HRA.05.04⁸³) 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 the Company's Business Plan Outcome Delivery Incentives (ODI)). The latter largely achieves phosphate neutrality of itself. EA and NE therefore have realistic expectations.

⁷⁵ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁷⁶ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁷⁷ [WHSAP.05](#) Wiltshire Housing Site Allocations Plan Heritage Impact Assessment Final Report, March 2018

⁷⁸ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁷⁹ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁸⁰ [HRA.05.01](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

⁸¹ [HRA.05.02](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix A Figs 1-16, January 2019

⁸² [HRA.05.03](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix A Figs 17-40, January 2019

⁸³ [HRA.05.04](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

67. The SAC Nutrient Management Plan (NMP) (BIO.19⁸⁴) 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.01⁸⁵) in a way that was consistent with Habitats Regulations.
68. The role of the NMP (BIO.19) has been supplemented by the IDP (HRA.05.01⁸⁶, HRA.05.02⁸⁷, HRA.05.03⁸⁸, HRA.05.04⁸⁹) and Wessex Water Outcome Delivery Incentive (see above) as a 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).
69. The WHSAP (WHSAP.01.01⁹⁰ and EXAM.01.01⁹¹) will be delivered alongside the IDP (HRA.05.01 – HRA.05.04) and ODI. Housing development proposed within the WHSAP (WHSAP.01.01 and EXAM.01.01) is accounted for within overall forecast development, both residential and non-residential, on which both the IDP (HRA.05.01–HRA.05.04) and ODI 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 (MoU) (HRA.03⁹²) makes clear that on large schemes the Council will seek on site mitigation measures to help mitigate the effects of development. The IDP (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.01) Core Policy 3.

Issue 5.12 - The supporting text for sites H2.4, H2.5, H2.6, H2.9 and H3.3 refers to parts of the sites being within Flood Zones 2 and/or Flood Zones 2 and 3. Is this approach consistent with national policy? Will the plan be effective in addressing drainage issues on these sites?

70. It is considered that the plan will be effective at addressing flood risk and drainage on this site. The SA Annex I (SA.01.A6⁹³) on page 82 for this site states that *'the site is located within Flood Zone 1 but adjacent to flood zones 2/3. A sufficient buffer zone should be left between any new development and the floodplain associated with the River Avon. Consideration should be given to sequentially planning the development of the site to ensure that the risk of flooding is alleviated'*.
71. The Salisbury CATP (CATP.13⁹⁴), Table G.4, also states *'the site adjoins water meadows that lie within Flood Zones (FZ) 2 and 3. It is considered that it would be possible to mitigate flood risk by sequentially planning development to avoid areas of*

⁸⁴ [BIO.19](#) River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁸⁵ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁸⁶ [HRA.05.01](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

⁸⁷ [HRA.05.02](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix A Figs 1-16, January 2019

⁸⁸ [HRA.05.03](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix A Figs 17-40, January 2019

⁸⁹ [HRA.05.04](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

⁹⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁹¹ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁹² [HRA.03](#) Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

⁹³ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex I A6, May 2018

⁹⁴ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

flood risk and incorporate an appropriate buffer to FZ 2 and 3. This will reduce the developable area of the site and its capacity’.

72. The boundary between Flood Zone 1 and Flood Zone 2 is the northern boundary of this site. The whole of this site is within Flood Zone 1. The representation to the WHSAP pre-submission consultation from the Environment Agency (letter dated 22 September 2017 ref 395940 – 2998) confirms this; it states for this site ‘*Flood Zone 1, however boundary adjacent to FZ2. No objection to this allocation provided a sequential approach within the site is applied, and development only takes place in FZ1. An adequate no development buffer must be left between built development and the adjacent FZ2, to take into account any climate change water level increases’.*
73. Schedule of Proposed Changes (EXAM.01.01⁹⁵) ref PC105, which amends WHSAP (WHSAP.01.01⁹⁶) paragraph 5.143, contains the incorrect statement that ‘*part of the site lies within Flood Zone 2’* – however the site boundary is adjacent to Flood Zone 2 as confirmed by the Environment Agency. PC105 does confirm that ‘*development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy to address issues of surface water flooding’* – this is considered to allow sufficient reassurance that development can take place on this site without increasing flood risk.

⁹⁵ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁹⁶ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

