

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H3.4 Land at Rowbarrow, Salisbury

PS/M3/60

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Matter 3: Housing Site Allocations

H3.4 Land at Rowbarrow, Salisbury

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, Policy H3 and the plan's supporting text do provide sufficient detail on form, scale, access and quantity of development for site allocation H3.4.
2. Site allocation H3.4 of the WHSAP (WHSAP.01.01¹ and EXAM.01.01²) and paragraphs 5.146 to 5.149 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 6.1ha of land*'. The Schedule of Proposed Changes and Annex H (EXAM.01.01 and EXAM.01.46³) refs PC107 – PC108, propose to amend the site area to 5.56 ha and amend the site boundary line accordingly to more accurately represent the land in ownership.
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.01⁴) 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 WHSAP (WHSAP.01.01) 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.02⁵), including the Sustainability Appraisal (SA.01.A.a⁶ and SA.01.A6⁷), and the findings are presented in the Salisbury Community Area Topic Paper (CATP) (CATP.13⁸) at Chapter 5 and Appendices D, F and G.
6. Sites that had been assessed through the Strategic Housing Land Availability Assessment (SHLAA) formed the starting point of further detailed assessment in line with Stage 2 of the Site Selection Methodology (TOP.02), as set out in Appendix D of the Salisbury CATP (CATP.13⁹).

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 [EXAM.01.46](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes Annex B-J, September 2018

⁴ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁵ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁶ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁷ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁸ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁹ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

7. The SHLAA site development capacities were estimated following the methodology set out in the September 2011 SHLAA Methodology (SHELAA.22¹⁰) which formed a 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 H3.4, the SHLAA capacity of this site (SHLAA ref 3272) was 149 dwellings. Stage 2 of the site selection process (TOP.02¹¹) considered whether any exclusionary criteria should be applied which may result in a reduction of the SHLAA site capacity. For this site, Appendix D of the Salisbury CATP (CATP.13¹²) shows that the remaining site capacity was reduced to 122¹³ dwellings as a result of part of the SHLAA site already being developed and part of the site being within a Scheduled Monument.
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.6 of the Salisbury CATP (CATP.13) lists a number of potential effects of developing this site and mitigation measures – these relate to biodiversity, heritage, landscape and education.
10. Table G.6 then states that *'mitigation measures to reduce the likely adverse effects of developing this site are considered to be reasonable and achievable. They reduce the dwelling capacity of the site. Dwelling capacity is estimated to be approximately 100 dwellings in recognition of measures needed to preserve heritage assets and mitigate landscape impacts'*.
11. The WHSAP (WHSAP.01.01¹⁴ and EXAM.01.01¹⁵), 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 WHSAP paragraphs 5.146 to 5.149 and in the Schedule of Proposed Changes (EXAM.01.01 and EXAM.01.46¹⁶) - refs PC107 - PC110.
12. Details relating to specific infrastructure requirements will be confirmed through the planning application process, in accordance with the Wiltshire Core Strategy (WCO.01¹⁷) 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 [SHELAA.22](#) Strategic Housing Land Availability Assessment – Methodology, September 2011

¹¹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

¹² [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

¹³ [CATP.13](#) Appendix D in Salisbury CATP ([CATP.13](#)) for SHLAA site 3272 contains a typo in the 10th column and incorrectly states '22 dwellings' as the remaining developable site capacity – this should say '122 dwellings'

¹⁴ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

¹⁵ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

¹⁶ [EXAM.01.46](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes Annex B-J, September 2018

¹⁷ [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

13. Likely effects of developing this site on biodiversity have been assessed in the Sustainability Appraisal Report and Annex I (SA.01.A.a¹⁸ and SA.01.A6¹⁹), Habitats Regulations Assessment (HRA) (HRA.01²⁰, HRA.02²¹ and HRA.02.a²²) and in Stage 4a of the site selection process (TOP.02²³), presented in the Salisbury CATP Appendix G (CATP.13²⁴). These assessments do not indicate that the site should not be allocated due to impacts on biodiversity.
14. The SA Annex I (SA.01.A6) page 129 evaluated this site as having likely moderate adverse effects on biodiversity. 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.11.
15. The further addendum to the HRA (HRA.02a) 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'*.
16. 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.03²⁵) 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.01.01²⁶) ref PC98 and this will allow phosphate neutral development to take place within the river catchment.
17. The SA Annex I (SA.01.A6²⁷) pages 127 – 129 also highlights some specific biodiversity issues at this site. Woodland belts on the boundaries of the site will need to be buffered from development, however, the site is considered large enough for the potential to make appropriate provision for green infrastructure. Hedgerows border all

¹⁸ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

¹⁹ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

²⁰ [HRA.01](#) Wiltshire Housing Site Allocations Plan Habitats Regulations Assessment Pre-Submission, June 2017

²¹ [HRA.02](#) Addendum to Wiltshire Housing Site Allocations Plan Pre-Submission Assessment under the Habitats Regulations, May 2018

²² [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

²³ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

²⁴ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

²⁵ [HRA.03](#) Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

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

²⁷ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

fields and should be retained wherever possible and enhanced, and additional hedgerow planting or other habitat creation should be included.

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

ii. green infrastructure and agricultural land

19. Likely effects of developing this site on green infrastructure and agricultural land have been assessed in the Sustainability Appraisal (SA.01.A.a²⁸ and SA.01.A6²⁹) and the assessment does not indicate that the site should not be allocated. Minor adverse effects are considered likely against relevant SA objectives.
20. The SA Annex I (SA.01.A6) states on page 130 that *'this site is partially within Grade 1, 2 or 3a Best and Most Versatile (BMV) agricultural land and therefore development of this site may lead to the loss of BMV agricultural land. Where possible, development on this site should be located so as to reduce the loss of BMV. Overall, given the size of the development a minor adverse effect is anticipated'*.
21. The NPPF (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.
22. The SA Annex I (SA.01.A6) on page 138 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 that *'a green infrastructure buffer would be required to screen the site from the Scheduled Ancient Monument (SAM) and Tree Preservation Order (TPO) woodland'*.
23. Paragraph 5.148 of WHSAP (WHSAP.01.01³⁰ and EXAM.01.01³¹ ref PC109) states that *'development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk & More Salisbury Depot. This would provide a setting for rights of way in the area and maintain their views of the Salisbury Cathedral spire'*.

iii. landscape quality and character

24. 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.02³²), presented in the Salisbury CATP (CATP.13³³). The assessments do not indicate that the site should not be allocated.
25. The SA Annex I (SA.01.A6) on page 139 records that the site is not located within or adjacent to any specific landscape designations, including Area of Outstanding Natural

²⁸ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

²⁹ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

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

³³ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

Beauty (AONB). Public Right of Way (PRoW) BRIT8 runs to the south of the site from which there are open views of the site and it is used by dog walkers frequently. Assuming this right of way remains open during construction and operation, no adverse effects are likely. There is no designated open space or common land within the site. The SA concludes that landscape impacts from developing this site are likely to be minor adverse overall.

26. The Landscape Assessment Part 2 (PSCON.11B) 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 sloping nature of the site, containment provided by the beech shelterbelt to the south and the Rowbarrow housing development to the north with wider views north towards Salisbury Cathedral spire are the main characteristics for most of the site'*. Overall mitigation potential is assessed as Moderate-High with the site being relatively well contained by the beech shelterbelt on the southern boundary, and overall Capacity to Accommodate Change is assessed as Moderate-High.
27. The WHSAP (WHSAP.01.01) considered the evidence and paragraph 5.148 states that *'this is a sloping and quite prominent site. In combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk & More Salisbury Depot'*.
28. These requirements are further enhanced in the Schedule of Proposed Changes (EXAM.01.01³⁴) ref PC109 to take more account of the conclusions on mitigation measures in the Landscape Assessment Part 2 (PSCON.11B).

iv. heritage assets

29. Likely effects of developing this site on heritage assets have been assessed in the Sustainability Appraisal (SA.01.A.a³⁵ and SA.01.A6³⁶) and in Stage 4a of the site selection process (TOP.02³⁷), presented in the Salisbury CATP (CATP.13³⁸). 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 reasonable and achievable.
30. The SA Annex I (SA.01.A6) on page 137 considers that, overall, there are likely to be moderate adverse effects on heritage assets. It states that *'the southern part of the site is located within the boundary of Woodbury Ancient Villages Scheduled Monument'*. Actually, a very small part of the site is within the Scheduled Monument and this area will form part of public open space and green infrastructure within the development. The SA states that *'development of the site has the potential to appropriately protect and enhance designated heritage assets according to their significance'*.

³⁴ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

³⁵ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

³⁶ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

³⁷ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

³⁸ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

31. WHSAP (WHSAP.01.01³⁹) paragraph 5.147, as amended by the Schedule of Proposed Changes (EXAM.01.01) at PC110, states that *'development will need to preserve the contribution made by the site to the setting and therefore, the importance of the Woodbury Ancient Villages Scheduled Monument. If necessary, land will need to be set aside from development. In line with national policy, detailed design and layout will be guided by an assessment of heritage assets and their significance (including the contribution made by their setting). Scheduled Monument consent will be required. The site also has high archaeological potential'*.
32. It is considered that, given the size of the site and approximate number of dwellings required, an appropriate design and layout can be achieved that will reduce adverse impacts on the setting of the Scheduled Monument and maintain views of the cathedral spire from the public right of way to the south of the site.
33. With regards archaeological potential, the Salisbury CATP (CATP.13⁴⁰) in Table G.6 states that *'preservation in-situ of significant archaeological finds may be required but would be a matter for detailed design and unlikely to significantly reduce the developable area of the site'*.
34. In conclusion, the Council considers this 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.

v. strategic and local infrastructure including transport

35. Likely effects of developing this site on strategic and local infrastructure have been assessed in the Sustainability Appraisal (SA.01.A.a⁴¹ and SA.01.A6⁴²) and in Stage 4a of the site selection process (TOP.02⁴³), presented in the Salisbury CATP (CATP.13). The assessments do not indicate that the site should not be allocated.
36. The SA Annex I (SA.01.A6) pages 129 – 142 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.
37. The SA Annex I (SA.01.A6) on page 141 states 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'*.
38. With regards school infrastructure, the SA Annex I (SA.01.A6) on page 141 states that *'the site is within the Longford Primary catchment. The school only has 3 classes and is on a very small site. The school could not be expanded to cater for the potential increase that would be generated by this site. The next nearest schools are the Harnham Schools which are also not capable of expansion'*. However, the Salisbury CATP (CATP.13⁴⁴) states in Table G.6 that the site is *'better related to the existing Harnham Schools where capacity would be created as a result of a new school at*

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

⁴⁰ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁴¹ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁴² [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁴³ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴⁴ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

Netherhampton Road. Development at Rowbarrow could therefore support improvements to the existing schools’.

39. Regarding transport infrastructure, the SA Annex I (SA.01.A6⁴⁵) on page 142 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’.*

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

40. 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.a⁴⁶ and SA.01.A6⁴⁷) and in Stage 4a of the site selection process (TOP.02⁴⁸), presented in the Salisbury CATP (CATP.13⁴⁹). The assessments do not indicate that the site should not be allocated.
41. 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.01.01⁵⁰), paragraph 5.128, as amended by the Schedule of Proposed Changes (EXAM.01.01⁵¹) 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’.*
42. The Salisbury CATP (CATP.13), Table G.6, states that *‘vehicle access is acceptable in principle. The development of the site would provide housing in a location with a reasonable level of access to the local services and facilities in Salisbury city centre but not within walking distance. There is a frequent bus route within 100m of the site and the Park & Ride is in close proximity’.*

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

43. 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), presented in the Salisbury CATP (CATP.13). The assessments do not indicate that the site should not be allocated.

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

⁴⁶ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁴⁷ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁴⁸ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴⁹ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁵⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁵¹ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

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 A6, May 2018

44. The SA Annex I (SA.01.A6⁵⁴) pages 129 – 136 has noted likely minor adverse effects from development of this site for these factors that are capable of being mitigated. This is a greenfield site with no known contamination issues. The site is located entirely within Flood Zone 1. There are no specific issues related to odour, noise or land stability associated with this site. 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.
45. 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.
46. Stage 4a of the site selection process (TOP.02⁵⁵), presented in the Salisbury CATP (CATP.13⁵⁶), states in Table G.6 that *'mitigation measures to reduce the likely adverse effects of developing this site are considered to be reasonable and achievable'*.

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

47. Likely effects of developing this site on open space, recreational facilities and public rights of way have been assessed in the Sustainability Appraisal Annex I (SA.01.A6⁵⁷) and the assessment does not indicate that the site should not be allocated.
48. The SA Annex I (SA.01.A6) has noted minor adverse effects that are capable of being mitigated. SA Annex I (SA.01.A6) on page 139 has highlighted that *'Public Right of Way (PRoW) BRIT8 runs to the south of the site from which there are open views of the site and it is used by dog walkers frequently. Assuming this right of way remains open during construction and operation, no adverse effects are likely. There is no designated open space or common land within the site'*.
49. The southern part of the site is on higher ground and the boundary of the Scheduled Monument runs across the very southern tip of the site. This is where public open space will be located within the site. WHSAP (WHSAP.01.01⁵⁸) paragraph 5.148, as amended by the Schedule of Proposed Changes (EXAM.01.01⁵⁹) ref PC109, states that *'in combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk & More Salisbury Depot. This green corridor should include copses, groups of trees and individual specimen trees. The arrangement of any proposed development and open space on the site should provide a setting for public rights of way in the area and maintain their views of the Salisbury cathedral spire and this could be achieved through careful street alignment and locating open space in the southern part of the site. The sloping buffer of land on the northern edge of the site should be enhanced with tree planting and the landscape buffer along Rowbarrow (road) retained'*.

⁵⁴ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁵⁵ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁵⁶ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁵⁷ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

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

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

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?

50. 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 allocation H3.4, together with amendments proposed in the Schedule of Proposed Changes (EXAM.01.01⁶⁰ and EXAM.01.46⁶¹) refs PC107 – PC110, 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 and landscape issues associated with the site.
51. The site will be developed in accordance with existing policies set out in the Wiltshire Core Strategy (WCO.01⁶²), 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?

52. WHSAP (WHSAP.01.01⁶³ and EXAM.01.01⁶⁴) 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.
53. 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.08⁶⁵ and WHSAP.08A⁶⁶). 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...'*
54. The SA (SA.01.A.a⁶⁷ and SA.01.A6⁶⁸) 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. WHSAP (WHSAP.01.01) paragraph 5.148, as amended by the Schedule of Proposed Changes (EXAM.01.01) ref PC109, contains specific requirements for the type and location of green infrastructure and open space provision at this site.
55. The SA Annex I (SA.01.A6) on page 141 states that *'on the basis of evidence supplied by the Wiltshire Clinical Commissioning Group (WCCG), all 6 GP surgeries in*

⁶⁰ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁶¹ [EXAM.01.46](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes Annex B-J, September 2018

⁶² [WCO.01](#) Wiltshire Core Strategy, January 2015

⁶³ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁶⁴ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁶⁵ [WHSAP.08](#) Salisbury Transport Strategy Draft Strategy Refresh 2018, July 2018

⁶⁶ [WHSAP.08A](#) Salisbury Transport Strategy Draft Strategy Refresh 2018 Summary, June 2018

⁶⁷ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁶⁸ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

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’.

56. With regards primary education provision, Stage 4a of the site selection process (TOP.02⁶⁹), presented in the Salisbury CATP (CATP.13⁷⁰) Table G.6, states that *‘the site is within the Longford Primary catchment. The school only has 3 classes and is on a very small site. The next nearest schools are the Harnham Schools which have inadequate capacity and are also not capable of expansion. The additional primary school places generated by this number of dwellings cannot be catered for in existing primary schools in the area and a new primary school capable of serving the site is necessary to enable development to go ahead.’* Policy H3.1 of WHSAP (WHSAP.01.01 and EXAM.01.01⁷¹) requires provision of *‘at least 1.8ha of land for a two-form entry primary school’* on the ‘Netherhampton Road site allocation, and WHSAP (WHSAP.01.01⁷² and EXAM.01.01⁷³) paragraph 5.128 states that *‘funding contributions will be sought from developers to help provide adequate capacity’.*
57. WHSAP (WHSAP.01.01 and EXAM.01.01) paragraph 5.149 states that *‘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. Funding contributions may also contribute to improving the existing primary schools at Harnham. In addition, 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?

58. The site is 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.02⁷⁴), presented in the Salisbury CATP (CATP.13⁷⁵) in Table G.6, states that *‘vehicle access is acceptable in principle. Impacts of developing this site on the road network through Salisbury will need to be addressed through a comprehensive Transport Assessment. The development of the site would provide housing in a location with a reasonable level of access to the local services and facilities in Salisbury city centre but not within walking distance. There is a frequent bus route within 100m of the site and the Park & Ride is in close proximity’.*

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?

59. The submission version of the WHSAP (WHSAP.01.01⁷⁶) explains at paragraph 5.12 that allocations are proposed at some settlements that involve a mix of uses or site-

⁶⁹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁷⁰ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁷¹ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁷² [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁷³ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁷⁴ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁷⁵ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁷⁶ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

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.

60. 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.01.01⁷⁷), the Council anticipates that development proposals relating to all allocations will be guided by relevant policies of the Wiltshire Core Strategy (WCO.01⁷⁸).
61. 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?

62. The proposed allocation is considered to be deliverable in the timescales envisaged.
63. This site is identified within Wiltshire Council's latest 2017 Strategic Housing and Economic Land Availability Assessment (SHELAA.14⁷⁹), under site reference 3272. The assessment confirms that the land is 'deliverable', i.e. that the land is available now with a realistic prospect of being viably developed for housing within five years. 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?

64. It is considered that the plan will be effective in preserving or enhancing the setting of the Cathedral.
65. WHSAP (WHSAP.01.01⁸⁰) paragraph 5.148, as amended by the Schedule of Proposed Changes (EXAM.01.01⁸¹) ref PC109, contains specific requirements for the type and location of green infrastructure and open space provision at this site. It states that *'in combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. The arrangement of any proposed development and open space on the site should provide a setting for public rights of way in the area and maintain their views of the Salisbury cathedral spire, and this could be achieved through careful street alignment and locating open space in the southern part of the site'*.
66. Impacts of developing this site on the setting of the Cathedral will not be significant.

⁷⁷ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁷⁸ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁷⁹ [SHELAA.14](#) Strategic Housing Land Availability Assessment Appendix 5.13 Salisbury Community Area, July 2017

⁸⁰ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁸¹ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

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.03⁸²)? Does the WHSAP provide an effective mechanism for this to be delivered?

67. 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.05.01⁸³ – HRA.05.04⁸⁴) 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.
68. The SAC Nutrient Management Plan (NMP) (BIO.19⁸⁵) 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.01⁸⁶) in a way that was consistent with Habitats Regulations.
69. The role of the NMP (BIO.19) has been supplemented by the IDP (HRA.05.01⁸⁷ – HRA.05.04⁸⁸) 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).
70. The WHSAP (WHSAP.01.01⁸⁹ and EXAM.01.01⁹⁰) 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.03⁹¹) 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.01.01⁹² and EXAM.01.01⁹³) 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

⁸² [HRA.03](#) Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

⁸³ [HRA.05.01](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

⁸⁴ [HRA.05.04](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

⁸⁵ [BIO.19](#) River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁸⁶ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁸⁷ [HRA.05.01](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

⁸⁸ [HRA.05.04](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

⁸⁹ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁹⁰ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁹¹ [HRA.03](#) Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

⁹² [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁹³ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

principle as a foundation for the approach already exists in Wiltshire Core Strategy (WCO.01⁹⁴) Core Policy 3.

⁹⁴ [WCO.01](#) Wiltshire Core Strategy, January 2015