

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H3.5 The Yard, Hampton Park, Salisbury

PS/M3/62

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¹ [HRA.03](#) Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

Matter 3: Housing Site Allocations H3.5 The Yard, Hampton Park, 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 H3.5.
2. This allocation is proposed in the Schedule of Proposed Changes Focussed Consultation Version - September 2018 and Annex I (EXAM.01.01² and EXAM.01.46³) under Proposed Change Reference Number PC111. This provides an overview of the form and scale of development that is expected to be delivered on the site. The quantity of development to be delivered is stated as '*approximately 14 dwellings on approximately 1.31ha of land*'.
3. Vehicular access to this site is stated in the Schedule of Proposed Changes (EXAM.01.01) Ref PC111 as '*via Neal Close*'. However, it should be noted that in the Statement of Common Ground with the site developer, **Wiltshire Council has agreed to amended wording for the policy to refer to vehicular access being by means of the existing track from Roman Road, rather than from Neal Close**; this will align the policy more directly to the current outline planning application on this site ref 16/06690/OUT (PH.09B⁴). The amended policy wording is proposed to be changed from '*Access to the site would be achieved via Neal Close*' to '*Vehicular access to the site would be achieved via the existing track with access onto Roman Road, with a pedestrian and cycle access route provided through to Neal Close.*'
4. The level of detail provided within the WHSAP (WHSAP.01.01⁵) and Schedule of Proposed Changes PC111 (EXAM.01.01 and EXAM.01.46) is sufficient, given that there are already policies concerning appropriate form, scale and access set out in policies in the Wiltshire Core Strategy (WCO.01⁶) that will also be used to determine future planning applications on this 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?

5. Yes, the amount of development proposed for this site is justified having regard to any constraints and the provision of necessary infrastructure.
6. The quantum of development appropriate for this site was considered through the site selection process (TOP.02⁷), including the Sustainability Appraisal (SA.01.A.a⁸ and

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 [PH/09B](#) Outline Planning Application 16/06690/OUT

⁵ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁶ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁷ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁸ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

SA.01.A6⁹), and the findings are presented in the Salisbury Community Area Topic Paper (CATP) (CATP.13¹⁰) at Chapter 5 and Appendices D, F and G.

7. This site was not assessed in the Strategic Housing Land Availability Assessment (SHLAA) because it was promoted to the Council as an omission site during the preparation of the WHSAP. It was given the site reference OM003. The site capacity was estimated at 15 dwellings for this site.
8. Stage 2 of the WHSAP site selection process (TOP.02¹¹) considered whether any exclusionary criteria should be applied which may result in a reduction of the site capacity; this is set out in Appendix D of the Salisbury CATP (CATP.13). No exclusionary criteria were relevant to this site, and the site capacity was not reduced at this stage.
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. Table G.8 of the Salisbury CATP (CATP.13) lists a number of potential effects of developing this site and mitigation measures – these relate to biodiversity, contaminated land, heritage, landscape and education.
10. Table G.8 then states that *'mitigation measures to reduce the likely minor adverse effects of developing this site are considered to be reasonable and achievable. Considering the effects noted above and taking account of required mitigation measures, including landscape and habitat mitigation, the site capacity would be capable of delivering approximately 14 dwellings'*. The summary section of Table G.8 states that *'all of the potential minor adverse effects associated with developing the site are considered to be capable of being addressed by straightforward mitigation measures'*.
11. The WHSAP (WHSAP.01.01¹²), 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 the Schedule of Proposed Changes (EXAM.01.01¹³ and EXAM.01.46¹⁴) at PC111 and Annex I.
12. Details relating to specific infrastructure requirements will be confirmed through the planning application process, in accordance with the Wiltshire Core Strategy (WCO.01¹⁵) and in light of up to date evidence. However, it is considered that approximately 14 dwellings on this site is justified, given the size of the site, acknowledged constraints and infrastructure requirements.

⁹ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

¹⁰ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

¹¹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, 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 [EXAM.01.46](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes Annex B-J, September 2018

¹⁵ [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.a¹⁶ and SA.01.A6¹⁷), Habitats Regulations Assessment (HRA) (HRA.01¹⁸, HRA.02¹⁹, HRA.02.a²⁰) and in Stage 4a of the site selection process (TOP.02²¹), presented in the Salisbury CATP Appendix G (CATP.13²²). 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) on pages 219 – 221 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.16.
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.03²³) 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.01.01²⁴) at ref PC98 and this will allow phosphate neutral development to take place within the river catchment.

¹⁶ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

¹⁷ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

¹⁸ [HRA.01](#) Wiltshire Housing Site Allocations Plan Habitats Regulations Assessment Pre Submission, June 2017

¹⁹ [HRA.02](#) Addendum to Wiltshire Housing Site Allocations Plan Pre-Submission Assessment under the Habitats Regulations, May 2018

²⁰ [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

²¹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

²² [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

²³ [HRA.03](#) Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

²⁴ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

17. The SA Annex I (SA.01.A6²⁵) on pages 219 – 221 also highlights some specific biodiversity issues at this site concerning the potential for hedgerows to be important for bat commuting, the site's potential use as a roost site for barn owls and a high population of Slow Worms at this site. Mitigation measures are considered to be achievable to reduce or avoid these impacts of development.
18. The Schedule of Proposed Changes (EXAM.01.01²⁶), at PC111, requires that Slow Worms will need to be '*translocated off site, which may be within the adjacent Country Park or other suitable location*' - this issue is discussed further under Issue 5.19 below.

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.a²⁷ and SA.01.A6²⁸) 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 site is relatively small at 1.31ha. The site is not in agricultural use and consists mainly of a large, disused former agricultural storage facility and associated former storage/farm yard. The site does also have small parcels of rough grassland but development will not lead to the loss of agricultural land.
21. The SA Annex I (SA.01.A6) on page 230 assessed likely effects on green infrastructure and found that the development of the site for housing could offer the potential to deliver some green infrastructure and that this could include access to the new Country Park adjacent to the site. There would be a requirement for development to provide a buffer to any mature trees and hedgerows within and adjacent to the site. The SA Annex I (SA.01.A6) on page 231 highlights that there are no designated Public Rights of Way (PROWs), open space or common land within the site, but there are several informal footpaths near to the site which could be maintained through development of 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.02²⁹), presented in the Salisbury CATP (CATP.13³⁰). The assessments do not indicate that the site should not be allocated.
23. Minor adverse effects are considered likely against relevant SA objectives. The SA Annex I (SA.01.A6) on page 230 records that the site is within a Special Landscape Area but there are no statutory landscape designations. The site is adjacent to existing residential development and development would necessitate the demolition of a large, disused agricultural storage building originating from the 1980s, constructed of concrete breeze block with a metal roof.

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

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

²⁷ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

²⁸ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

²⁹ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

³⁰ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

24. The Landscape Assessment Part 3 – Omission Sites May 2018 (WHSAP.21³¹) 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 *'this is a contained brownfield site with proposed housing replacing a large derelict agricultural shed, and as such landscape effects would be limited and localised.'* It concludes that Capacity to Accommodate Change is high and that *'this is a brownfield site which is visually contained to the south, west and north....the proposed housing would be seen as an extension of Hampton Park.'*
25. Effects on the landscape are likely to be well contained but the site is in a rural fringe setting and the Schedule of Proposed Changes (EXAM.01.01³²), at PC111, requires any development to include *'a robust landscape strategy and infrastructure to allow any development to appear as a natural extension to Hampton Park'*.

iv. heritage assets

26. Likely effects of developing this site on heritage assets have been assessed in the Sustainability Appraisal (SA.01.A.a³³ and SA.01.A6³⁴) and in Stage 4a of the site selection process (TOP.02³⁵), presented in the Salisbury CATP (CATP.13³⁶). 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 minor adverse effects of developing this site are considered to be reasonable and achievable.
27. The SA Annex I (SA.01.A6) on page 229 considers that, overall, there are likely to be neutral effects on heritage assets. It states that *'the site does not fall within or adjacent to any heritage designations and is not in the vicinity of any listed buildings. The boundary of the Old Sarum Conservation Area lies approx. 300m to the north of this site. However, as the site lies in a levelled dip below the ridge, it appears likely that any sensitively designed and appropriately located residential development would not encroach into longer range significant views'*

v. strategic and local infrastructure including transport

28. Likely effects of developing this site on strategic and local infrastructure 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.
29. The SA Annex I (SA.01.A6) on pages 222 – 234 considers that, given the small capacity of this site, minor adverse effects are likely on water and sewerage infrastructure, local healthcare facilities, local schools and the local highway network. The Salisbury CATP (CATP.13) Table G.8 notes that *'this site is very close to Greentrees Primary School but the school is full and cannot be expanded. Therefore, a full contribution would be required for additional places at the new Longhedge Primary School'*.

³¹ [WHSAP.21](#) Wiltshire Housing Site Allocations Plan Stage 4a Site Landscape Assessment Part 3 Omission Sites, May 2018

³² [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

³³ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

³⁴ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

³⁵ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

³⁶ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

30. The Salisbury CATP (CATP.13³⁷) Table G.8 states that *'the site is in an accessible and sustainable location capable of being served by existing highways infrastructure, there is good access to a range of local facilities from this site, including pre-school, primary and junior schools, a community centre, retail facilities, employment and bus stops, within walking distance. The site is not of a size that will significantly add to pressures on local infrastructure, services and facilities'*.

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

31. 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.a³⁸ and SA.01.A6³⁹) and in Stage 4a of the site selection process (TOP.02⁴⁰), presented in the Salisbury CATP (CATP.13). The assessments do not indicate that the site should not be allocated.
32. The SA Annex I (SA.01.A6) on page 235 states that minor adverse effects would be likely from development of this site. It states that *'the site is small and has good access to a range of local services, facilities and employment'*.
33. Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13) Table G.8, states that *'there are bus routes operated by Salisbury Reds and Park & Ride services serving this area within walking distance of the site. The nearest bus stop is approx. 480m from the site. Development of this small site is not considered likely to lead to congestion or highway safety problems'*.

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

34. 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.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.
35. The SA Annex I (SA.01.A6) pages 221 – 228 has noted minor adverse effects for these factors that are capable of being mitigated. The site is located entirely within Flood Zone 1. The site falls within the catchment of the Hampshire Avon, a high-risk catchment for phosphate loading. This is considered further under Issue 5.11 below.
36. Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13) in Table G.8, states that *'the position with regards contamination is not currently known but as this site has previously been used for agricultural storage purposes, an assessment of the history and current condition of the site to determine the likelihood of the existence of contamination arising from previous uses should be carried out as part of any planning application process'*.

³⁷ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

³⁸ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

³⁹ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁴⁰ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

37. Stage 4a of the site selection process (TOP.02⁴¹), presented in the Salisbury CATP (CATP.13⁴²) in Table G.8, states that *'all of the potential minor adverse effects associated with developing the site are considered to be capable of being addressed by straightforward mitigation measures.'*

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

38. 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.a⁴³ and SA.01.A6⁴⁴) and the assessment does not indicate that the site should not be allocated.
39. 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 230 has highlighted that *'the development of the site for housing could offer some Green Infrastructure but it is not large enough to deliver a network of multifunctional GI'* and that *'there is good access from this site to the adjacent Country Park'*. There is no designated open space or common land within the site, but provision of public open space as part of any development is possible.
40. The SA Annex I (SA.01.A6) on page 231 notes that *'there are several informal footpaths near to the site which could be maintained through development of the site'*. Stage 4a of the site selection process (TOP.02⁴⁵), presented in the Salisbury CATP (CATP.13⁴⁶) Table G.8, states that *'access can be provided from this site to the adjacent Country Park, thereby providing access to public open space and potential health benefits to future residents'*.

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?

41. 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 provides contextual detail which will guide future developers and decision makers and inform mitigation measures that may be required. These measures include addressing issues regarding providing access to the adjacent Country Park, protection of hedgerows around the site and the translocation of reptiles to a suitable receptor site.
42. The site will be developed in accordance with existing policies set out in the Wiltshire Core Strategy (WCO.01⁴⁷), 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?

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

⁴⁴ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁴⁵ [TOP.02](#) Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology, July 2018

⁴⁶ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 2018

⁴⁷ [WCO.01](#) Wiltshire Core Strategy, January 2015

43. Stage 4a of the site selection process (TOP.02⁴⁸), presented in the Salisbury CATP (CATP.13⁴⁹) Table G.8, states that *'the site is not of a size that will significantly add to pressures on local infrastructure, services and facilities'*. However, requirements for infrastructure contributions will be subject to review through the consideration of future planning applications submitted on the site.
44. WHSAP (WHSAP.01.01⁵⁰ and EXAM.01.01⁵¹) 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)'*.
45. WHSAP (WHSAP.01.01) paragraph 5.128, as amended by Schedule of Proposed Changes (EXAM.01.01) ref PC97 specifically mentions the refresh of the Salisbury Transport Strategy (WHSAP.08⁵² and WHSAP.08A⁵³). It states *'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. Development will contribute to these wider network measures, where necessary...'*. It is not considered likely that development of this relatively small site for approximately 14 dwellings will significantly impact the local highway network.

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?

46. Stage 4a of the site selection process (TOP.02), presented in the Salisbury CATP (CATP.13) Table G.8, states that *'the site is in an accessible and sustainable location capable of being served by existing highways infrastructure...there is good access to a range of local facilities from this site, including pre-school, primary and junior schools, a community centre, retail facilities, employment and bus stops, within walking distance. There are bus routes operated by Salisbury Reds and Park & Ride services serving this area within walking distance of the site. The nearest bus stop is approx. 480m from the site'*.
47. The site is adjacent to the existing settlement boundary of Salisbury, approximately 3.5km from the city centre. The site is not considered to be within walking distance of the city centre, but cycling would be feasible, and there are a number of essential services and facilities in the local area within walking distance.

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

⁵³ [WHSAP 08A](#) Salisbury Transport Strategy Draft Strategy Refresh 2018 Summary, June 2018

Issue 5.7 - In cases where allocations do not have specific policies, is the reliance on supporting text likely to be an effective means of delivering the Council's requirements for each site? What is the justification for some sites having specific policies and some not?

48. The submission version of the WHSAP (WHSAP.01.01⁵⁴) explains at paragraph 5.12 that allocations are proposed at some settlements that involve a mix of uses or site-specific complexities and where it is more appropriate for development to be guided by a master plan approach, as opposed to detailed matters being addressed through policy criteria. There are five sites that have been identified as requiring a master plan.
49. The remaining sites are allocated by Policies H2 and H3. Due to their less complex nature, these sites were not considered to require a master planned approach, and thus do not have a specific policy. The supporting text to the allocated sites provides future developers and decision makers with important contextual information regarding matters that will need to be addressed through the planning application process. Indeed, as set out 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.01⁵⁵).
50. In conclusion, the Council considers that the specific requirements for each allocation within the WHSAP can effectively be delivered as drafted through a combination of policies and supporting text that will all be read in conjunction with the WCS.

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

51. The proposed allocation is considered to be deliverable i.e. 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.
52. This site is subject of a live outline planning application reference 16/06690/OUT (PH.09A⁵⁶) for 14 dwellings.

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

53. With regards this site at The Yard, Hampton Park, the evidence base, including Sustainability Appraisal (SA.01.A.a⁵⁷ and SA.01.A6⁵⁸) and Salisbury CATP (CATP.13⁵⁹), has shown no potential impacts of development of this site on the setting of Salisbury Cathedral.

⁵⁴ [WHSAP.01.01](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁵⁵ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁵⁶ [PH.09A](#) Planning Application 16/06690/OUT

⁵⁷ [SA.01.A.a](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Revised September 2018

⁵⁸ [SA.01.A6](#) Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex A6, May 2018

⁵⁹ [CATP.13](#) Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Salisbury - Submission Version, July 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.03⁶⁰)? Does the WHSAP provide an effective mechanism for this to be delivered?

54. 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.05.01⁶¹ – HRA.05.04⁶²) 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.
55. The SAC Nutrient Management Plan (NMP) (BIO.19⁶³) 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.01⁶⁴) in a way that was consistent with Habitats Regulations.
56. The role of the NMP (BIO.19) has been supplemented by the IDP (HRA.05.01⁶⁵ – HRA.05.04⁶⁶) 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).
57. The WHSAP (WHSAP.01.01⁶⁷ and EXAM.01.01⁶⁸) 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.03⁶⁹) 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;

⁶⁰ [HRA.03](#) Memorandum of Understanding River Avon SAC Phosphate Neutral Development – Interim Mitigation, May 2018

⁶¹ [HRA.05.01](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

⁶² [HRA.05.04](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

⁶³ [BIO.19](#) River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁶⁴ [WCO.01](#) Wiltshire Core Strategy, January 2015

⁶⁵ [HRA.05.01](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, January 2019

⁶⁶ [HRA.05.04](#) River Avon SAC – Phosphate Neutral Development Interim Delivery Plan Appendix B, January 2019

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

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 5.19 - The supporting text for Sites H3.2 and H3.5 refers to the likely need to translocate populations of slow worms to other sites. Is this approach consistent with national policy? What is the evidence that such sites exist and would be effective in providing mitigation?

58. It is considered that the approach to reptile (Slow Worm) translocation is consistent with national policy.
59. The Schedule of Proposed Changes (EXAM.01.01⁷⁰), under Proposed Change Reference Number PC111, states that *'there is a high population of slow worms to be translocated off site, which may be within the adjacent Country Park or other suitable location. Given the potential scale of the translocation, any receptor site will need to provide suitable habitat conditions for the species'*.
60. This site is the subject of a live outline planning application (PH.09A⁷¹), which is accompanied by an update letter (PH.09E⁷²) from the landowners' agent. This confirms that an updated ecological assessment (PH.09D⁷³) has been provided that outlines details of additional reptile surveys undertaken, sets out a Reptile Mitigation Strategy and in particular, the location of a suitable nearby receptor site.
61. The updated ecological assessment referred to above states in paragraph 8.3.1 that *'it is necessary to plan and implement a reptile mitigation and compensation strategy that will ensure reptiles are not harmed or killed as a result of the development or that the development would not impact upon the conservation status of reptiles within the local area...'* Paragraph 8.3.3.1 confirms that a receptor site has been chosen and *'is located adjacent to the development site...the field will form part of the future Country Park (this area has been proposed as 'Grass/scrub Mosaic via natural regeneration' under the proposals: the usage of this section as a reptile receptor site has been discussed and agreed with the [Laverstock and Ford] Parish Council. The receptor site provides an area of land greater than the area of reptile habitat to be lost to the development (approximately 1.2ha versus just under 0.9ha) and will be enhanced...to provide optimum reptile habitat, exceeding the current quality of reptile habitat on the development site, with a management scheme implemented to ensure its long-term quality'*.

⁷⁰ [EXAM.01.01](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁷¹ [PH.09A](#) Planning Application 16/06690/OUT

⁷² [PH.09E](#) Planning Application 16/06690/OUT Update letter from Savills, February 2019

⁷³ [PH/09D](#) Planning Application 16/06690/OUT Update to Ecological Information, January 2019