

Wiltshire Housing Site Allocations Plan Examination in Public

Position Statement on Matter 3

Housing Site Allocations

H3.6 Clover Lane, Durrington

PS/M3/64

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Matter 3: Housing Site Allocations H3.6 Clover Lane, Durrington

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 allocation H3.6 of the Wiltshire Housing Site Allocations Plan (WHSAP) Submission Document (WHSAP.01.01¹) and supporting text, incorporating the Council's Schedule of Proposed Changes (EXAM.01.01² & EXAM 01.46³), when read in conjunction with the introductory supporting text in Chapter 5 of the Plan (paragraphs 5.1 to 5.12) provide sufficient detail. The introductory supporting text clarifies that the policies of the Wiltshire Core Strategy (WCO.01⁴) will also apply in considering the development of the site. When taken together with the Core Strategy, the Council considers the Plan provides sufficient detail on form, scale, access and quantity of development.
2. The quantity of development to be delivered is established in policy through the Plan and Schedule of Proposed Changes (EXAM.01.01) as being approximately 45 dwellings on a site area of approximately 0.9ha which is considered to be achievable for the site.
3. Moreover, the supporting text to H3.6 identifies a number of important elements that will need to be incorporated into development proposals (paragraphs 5.153 to 5.156).
4. The Plan includes specific details about access for this site at paragraph 5.154, whereby existing access will be via the existing residential road network at Clover Lane, with pedestrian and cycling permeability throughout and an additional pedestrian and cycle access linking through to High Street. Access considerations were assessed through the site selection process and are set out in the Amesbury Community Area Topic Paper (CATP) at p67 and p124-130 (CATP.01⁵).
5. Paragraph 5.155 of the Plan (including PC 115 (EXAM.01.01)) sets out details to ensure that a robust heritage assessment will inform the detailed design and layout of the development. Paragraph 5.156 sets out the importance of retaining and enhancing a group Tree Preservation Order (TPO) tree belt and mature trees and hedgerows at the site, whereby relevant assessments will inform development proposals and be submitted with a planning application.
6. The Schedule of Proposed Changes (September 2018) (EXAM 01.01 & EXAM 01.46) includes a change to the area and boundary of the allocation. This is to correct the boundary due to an error made in the Submission Plan only. It does not affect the number of dwellings on the site.

¹ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

² [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - September 2018 (Part 1 of 46)

³ [\[EXAM.01.46\]](#) Schedule of Proposed Changes – Consultation Document - September 2018 (Part 46 of 46)

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

⁵ [\[CATP.01\]](#) Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

7. Therefore, when read as a whole, the Council considers that the level of detail provided in the Plan is sufficient for the purpose of providing the necessary certainty to local communities and developers without being overly prescriptive.

Issue 5.2 - Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

8. The Council considers that the amount of development proposed for the site (approximately 15 dwellings) is justified by the evidence base (TOP.02⁶, CATP.01⁷, SA01A.a⁸, SA01.A2⁹) and has had full regard to site specific constraints including: drainage, flood risk, heritage, landscape and ecology, and infrastructure requirements.
9. This allocation (H3.6) is formed of parts of two sites submitted to the SHLAA (3154 and s98). The SHLEAA (SHLAA 2011 Methodology (SHELAA.22¹⁰)) site capacity was estimated at 29 dwellings for SHELAA site 3154 and 103 dwellings for SHLAA site s98 (SHLAA Amesbury Appendix (SHLAA2012.01¹¹), which formed a starting point for assessment using 30 dwellings per hectare and applying a multiplier to reduce the developable area to allow for non-housing uses.
10. Stage 2 of the WHSAP site assessment process then considered whether exclusionary criteria (such as Flood Zones 2/3) should result in reduction of the SHLAA site capacity. In the case of site 3154, the site capacity was reduced from 29 to 14 dwellings as part of the site was already the subject of an extant planning permission (a 'commitment' for the purposes of the methodology) (CATP.01, Table D.3, p62) (CATP.01).
11. The amount of development proposed at this site was further reduced due to constraints identified for site s98 through the more detailed assessment in the Sustainability Appraisal (SA01.02), summarised in the Amesbury CATP (Appendix F, p95-97 (CAPT.01) and subsequent assessment (Appendix G p124-130). This was primarily due to impacts on heritage assets and their setting, landscape, biodiversity, water supply, drainage and capacity of the primary school. In light of these overlapping constraints, the capacity of the site was further reduced to 45 dwellings.
12. The site selection process concluded (CATP.01, TableG.3, p137) that sites 3154 and s98 should be brought forward together, along with the parcel of land between them (that already had planning permission) for a total of 45 dwellings. This would enable the sites to be developed holistically, maximising the opportunities to achieve a suitable access, link into built development, open space and existing routes for pedestrian, cycle and vehicle movement. In this configuration the allocated site does have some remaining adverse impacts (e.g. heritage) but these are thought to be possible to mitigate through the application of policies in the Wiltshire Core Strategy.
13. Further infrastructure requirements for the proposed site were related to the necessary and achievable expansion of the secondary school and health facilities. In addition, water supply and drainage infrastructure will need to be upgraded at Durrington, which

⁶ [TOP.02] Topic Paper 2: Site Selection Process Methodology – Submission version July 2018.

⁷ [CATP.01] Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

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

⁹ [SA01.02] Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

¹⁰ [SHELAA.22] Strategic Housing Land Availability Assessment – Methodology, September 2011

¹¹ [SHLAA.01] SHLAA 2012, Appendix-3 Amesbury

is considered possible. Key infrastructure requirements are identified in the Plan on page 68 (as amended by PC113 (EXAM01.01¹²). Infrastructure requirements will be confirmed through the planning application process according to up to date evidence at the time.

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

14. Wiltshire Council considers that any impacts of development on biodiversity can be successfully managed and mitigated, and would not preclude development of the site.

15. The Sustainability Appraisal (SA) for this site (SA.01A.02) was informed by a settlement level Habitats Regulation Assessment (HRA.01¹³) which concluded that the relationship of the site with the River Avon Special Area of Conservation (SAC) and Salisbury Plain Special Protection Area (SPA) could contribute to in-combination effects and that appropriate assessment would be required. Subsequently the council produced an Addendum under the Habitats Regulations (HRA.02¹⁴), and a further Addendum (HRA.02a¹⁵) to support the council's Schedule of Proposed Changes, which provided the further assessment that was required for both matters.

16. The likely effects on the River Avon SAC are related to water abstraction and the discharge of phosphates. Informed by early assessment under the HRA Regulations, text was included at paragraph 5.152 of the Plan to address the need to review water abstraction and provide any necessary upgrades prior to development. In relation to the discharge of phosphates, Wiltshire Council has undertaken further assessment and carried out work in conjunction with Natural England and the Environment Agency, taking account of their comments on the Pre-submission draft of the Plan. It was agreed that additional wording should be inserted into the Plan to provide greater certainty over the need to provide for phosphate neutral development. This has been agreed through a Memorandum of Understanding (HRA.03¹⁶) which has informed a proposed change to the Plan (PC35), as set out in the Schedule of Proposed Changes (EXAM01.01). Wiltshire Council considers that the potential impacts are addressed through the supporting text of the Plan at paragraph 5.5 (as amended). The issue of phosphate discharge to the River Avon is discussed in more detail below, in the Council's response to Issue 5.11.

17. The likely effects on the Salisbury Plain SAC relate to the increased visitor pressure on the stone curlew population. The Addendum under the Habitats Regulations (HRA.02a) confirms that the council has updated the HRA and Mitigation Strategy for Salisbury Plain SPA (HRA.04¹⁷) to take account of the latest visitor survey results and stone curlew monitoring, and there are no recommendations for changes to policies or supporting text in the Plan.

¹² [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - September 2018 (Part 1 of 46)

¹³ [\[HRA.01\]](#) Habitats Regulations Assessment - Pre-submission draft plan, June 2017

¹⁴ [\[HRA.02\]](#) Addendum to the HRA, May 2018

¹⁵ [\[HRA.02.a\]](#) Addendum to the HRA, May 2018 (Factual Update - September 2018)

¹⁶ [\[HRA.03\]](#) Memorandum of Understanding - River Avon Special Area of Conservation Phosphate Neutral Development - Interim Mitigation

¹⁷ [\[HRA.04\]](#) HRA and Mitigation Strategy for Salisbury Plain SPA in Relation to Recreational Pressure from Development

18. These effects and additional biodiversity aspects at the site were assessed through the Sustainability Appraisal (SA.01A.2¹⁸) (p2-4 & p21-22), summarised in the Amesbury CATP at Appendix F, table F.5, p95-97, and Appendix G, p124-130 (CATP.01¹⁹). The assessment concluded that development might need to include protection measures to protect and enhance habitats associated with mature trees and hedgerows. Such matters are considered to be captured within the scope of WCS Core Policy 50, and it is expected that this would be addressed through the submission of an ecological assessment as part of any future planning application

ii. green infrastructure and agricultural land

19. Green infrastructure (GI) aspects were assessed through Sustainability Appraisal (SA.01A.2) (p34-35 & 15-16) and subsequent assessment at Stage 4 (Amesbury CATP, Appendix G, p124-130). It should be noted that the SA assessment reports discuss features and mitigation that are relevant to the entirety of site s98, but are not relevant to the allocated portion of the site. The remaining relevant issues are that there would be potential impacts on tree belts that are significant to landscape character and mature trees and hedgerows within and at boundaries of the site should be retained. Mitigation measures would include incorporating GI into any subsequent development proposals.

20. The (SA.01A.2) (p15 & 34) states that development of the site offers potential to contribute towards the delivery of a comprehensive network of green infrastructure and retention of hedgerows. The supporting text of the Plan (paragraph 5.156) sets out the requirements for the site in relation to green infrastructure. There is no evidence to suggest that mitigation measures are not achievable. Development proposals will be considered in the context of requirements set out in WCS Core Policy 52 (WCO.01²⁰)

21. Agricultural land was considered and evaluated in the Sustainability Appraisal (SA.01A.2) (p5 & 24-25) on the basis of available evidence and the impact was considered to be minor to negligible. There is no evidence to indicate that the site should not be allocated.

iii. landscape quality and character

22. Landscape aspects were assessed through the Sustainability Appraisal (SA.01A.2) (p34-35 & 15-16) and informed by a Landscape Character Assessment (PSCON.11.A²¹), whereby development at site 3154 (p33-34) was considered to be a logical extension of current pattern of development and noting the importance of retaining mature trees, in particular a tree belt subject to TPO. For site s98 (p15-16) the assessment highlighted the significance of the belts of TPO trees at the site boundaries in relation to the landscape character and the importance of their retention. Any access from Netheravon Road or Hackthorne Road would disrupt the tree belt at the northern boundary. For this reason, and the mitigation of the visual impact of development at this site, it was considered appropriate to reduce the number of

¹⁸ [\[SA01.02\]](#) Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

¹⁹ [\[CATP.01\]](#) Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

²⁰ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

²¹ [\[PSCON.11.A\]](#) The Environment Partnership. Wiltshire Housing Site Allocations Plan, Stage 4a, Site Landscape Assessment, Part 1. June 2017.

dwellings, as set out in Stage 4 of the site selection process (Amesbury CATP.01²², Appendix G, p124) and to secure access that does not affect the tree belts. It is considered that mitigation measures are possible and subsequently the area of the site was substantially reduced to the proposed area of the allocation. There is no evidence to indicate that the site should not be allocated as per the proposed site area.

23. Paragraphs 5.156 provides guidance on the landscaping elements that need to be incorporated, which would be supported by the requirements of WCS Core Policy 51 and 52. In conclusion, it is considered that mitigation measures to address landscape quality and character are deliverable and capable of being fully addressed through landscape assessment informing development proposals and submitted as part of any future planning application, in line with WCS Core Policy 51 and there is no reason that the site should not be allocated

iv. heritage assets

24. Heritage aspects were assessed through the Sustainability Appraisal (SA.01A.2²³) (p13-15 & 33-35) and subsequent assessment at Stage 4 as set out in the Amesbury CATP (CATP.01) (Appendix G, p124-130). Individually site 3154 and site s98 were assessed as having minor and moderate adverse impacts on heritage assets respectively, as summarised in the Amesbury CATP (Appendix F, p.95-97). s98 is adjacent to the listed Durrington Manor and the site lies adjacent and partially within the Conservation Area, with a high potential for archaeology. The final allocated area of the site has been configured so that it is no longer within the Conservation Area, however development still has the potential to impact the settings of the Conservation Area and Listed Buildings.

25. A robust Heritage Impact Assessment will need to inform proposals and additional text has been proposed for the Plan (PC115) at paragraph 5.155 to ensure that the heritage assessment will guide the detailed design and layout of the development, in line with national policy, as set out in the Schedule of Proposed Changes (EXAM01.01²⁴). Application of Core Policies 57 and 58 will be relevant in ensuring good design in this potentially sensitive area.

v. strategic and local infrastructure including transport

26. The requirement to consider strategic and local infrastructure requirements is set by WCS Core Policy 3. Core Policy 3 provides a sound and suitable approach to ensuring that the development of the Upper Studley site will provide for essential and place-shaping infrastructure where it is needed, in a timely manner.
27. Strategic and local infrastructure aspects were assessed through the Sustainability Appraisal (SA.01A.2) (p.36-38 for site 3154 and p.17-19 for site s98) and subsequent assessment at Stage 4, as set out in the Amesbury CATP (CATP.01) (Appendix G, p124-130) and mitigation measures were suggested for any subsequent development proposals. Development at this site would result in the need to mitigate pressure on health facilities. The assessment also identified that the local primary school was at capacity with no further potential for expansion, limiting the number of dwellings that

²² [CATP.01] Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

²³ [SA01.02] Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

²⁴ [EXAM.01.01] Schedule of Proposed Changes – Consultation Document - September 2018 (Part 1 of 46)

could be allocated at Durrington, which aligns with the scale of development at this site. The secondary school would need to be expanded. It is considered that mitigation measures are possible and there is no evidence to indicate that the site should not be allocated.

28. As discussed in the relevant sections, in relation to potential impacts on biodiversity and groundwater, water drainage and supply infrastructure upgrades will need to be informed by the relevant assessments and incorporated into the proposals. The Water Industry Act 1991 ensures that the necessary infrastructure will be in place prior to development.
29. The Council considers that the planning application process will allow for relevant assessments informing development proposals and submitted with a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3.

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

30. The efficient operation of the transport network and highway safety were considerations in Stage 4 of the site selection process. There is no evidence to indicate that the site should not be allocated.
31. It was a consideration that access would not be suitable at the northern boundary of s98 from Hackthorne Road, which contributed to the decision to limit development to the southern portion of site s98, and to link it with site 3154, thereby enabling an access from the southern boundary of the site onto an existing residential road. Congestion issues at Durrington and the need to improve cycle and pedestrian connectivity were considerations in specifying the requirements for this allocation at paragraph 5.157 of the Plan. Considerations and conclusions are set out in the Amesbury CATP (Appendix G, p123 onwards (CATP.01²⁵)).

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

32. Air and water quality, noise pollution, odours, groundwater and flood risk were all considered through the Sustainability Appraisal (SA.01A.2²⁶). Specific constraints were identified for this site, which include its location with a Groundwater Protection Zone 2 and in close proximity to the River Avon and Flood Zone 2 and 3. Mitigation measures related to the choice of water management techniques are relevant and considered to be achievable. Comments made by the Environment Agency through the Pre-Submission Consultation (Regulation 22 Report (WHSAP.09²⁷, p23 and WHSAP.11²⁸, p189)) in relation to flood risk have been taken in to consideration, and the Plan is proposed to be changed (PC33 & PC116) to include additional text, as set out in the Schedule of Proposed Changes (EXAM01.01²⁹).

²⁵ [\[CATP.01\]](#) Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

²⁶ [\[SA01.02\]](#) Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

²⁷ [\[WHSAP 09\]](#) Consultation Statement Regulation 22 (1) (c) Submission version July 2018.

²⁸ [\[WHSAP.11\]](#) Consultation Statement Regulation 22 (1) (c) Appendix M. July 2018

²⁹ [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - September 2018 (Part 1 of 46)

33. In relation to water quality, the site is within the catchment of the River Avon and mitigation as per the Memorandum of Understanding on Phosphate Neutral Development (HRA.03³⁰) will be relevant and is considered achievable (as discussed elsewhere in this document). Proposals will need to be informed by the appropriate assessment and MoU as well as extensive testing on site in relation to drainage. Additional text is proposed to be included in the Plan (PC35) to provide greater certainty over the need to ensure housing development is phosphate neutral (EXAM.01.01³¹).
34. In light of the requirements of the NPPF in relation to land stability, there are no known issues of concern in relation to this site. A noise assessment may be required for this site due to the adjacent road, however there is no evidence to indicate that development would not be possible.
35. Air quality, noise, odours and vibration associated with construction as well as any impacts caused by or affecting the residential use have also been considered and the effects identified can be fully mitigated through application of existing policy and regulations. Mitigation measures to limit the impacts of vehicular movements on local air quality would need to be developed and implemented in accordance with local plan policy and advice from relevant bodies.

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

36. The provision, protection and enhancement of open space, recreational facilities and public rights of way have been assessed through the Sustainability Appraisal (SA.01A.2³²) (p15-16 & 33-35). The site will be required to deliver open space, appropriate to its size. There are no specific considerations in relation to public rights of way but the site is considered to have the ability to contribute to the protection and enhancement of the existing rights of way network, open spaces and common land, as appropriate. This is supported by the existing green infrastructure requirements set out in WCS Core Policy 52.

Issue 5.4 - In relation to the above, does the plan contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development?

37. Chapter 5 of the Plan, including Policy H3, allocation H3.6 and their supporting text (with Proposed Changes 112 to 116) are considered to provide contextual detail that will guide future developers and decision makers and thereby inform mitigation measures required to support development. Reference is made to the need to develop proposals in accordance with existing policies set out in the Wiltshire Core Strategy also, such that there are already effective safeguards to ensuring acceptable forms of development are to be delivered.

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?

³⁰ [\[HRA.03\]](#) Memorandum of Understanding - River Avon Special Area of Conservation Phosphate Neutral Development - Interim Mitigation

³¹ [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - September 2018 (Part 1 of 46)

³² [\[SA01.02\]](#) Wiltshire Council / Atkins – Sustainability Appraisal - SA.01A.2 SA Report Annex 1 A2 Amesbury, Bulford and Durrington

38. WHSAP paragraphs 5.1 – 5.12 introduce a range of generic requirements that may be required for each site. Paragraphs 5.1 states that *'development will be required to provide for the necessary on-site and, where necessary, off-site infrastructure requirements arising from proposals in accordance with [WCS] Core Policy 3 (Infrastructure requirements)'*.
39. 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.
40. Paragraph 5.150 of the Plan refers to the need to upgrade water supply network at Durrington in order to accommodate further growth, and that upgrades may need to be in place before development can commence.
41. The Sustainability Appraisal identified the need for development at Durrington to contribute to health facilities and school provision to meet the needs of the new development. Details are documented in the Amesbury CATP, Appendix G (CATP.01³³).
42. The Sustainability Appraisal and consultation with relevant bodies indicated the need to review water infrastructure at Durrington, in relation to foul water drainage and water supply. The Plan requires a detailed Flood Risk Assessment of this site, (as set out in paragraph 5.4 and 5.5 of the Plan, as amended by the proposed changes PC33 & PC34³⁴) which will inform proposals and incorporate the necessary mitigations, which is considered possible and does not preclude allocation of the site.
43. The Council considers that existing the planning application process will allow for up to date evidence at the time of a planning application to be used to determine appropriate contribution to any necessary infrastructure, in accordance with WCS Core Policy 3.

Issue 5.6 - Is the site in an accessible location with good access to everyday facilities by a range of means of transport? Does the plan provide an adequate basis to address any areas of deficiency?

44. The accessibility of the proposed allocation assessed through Stage 2 (under 'land developable', Table D.3) and Stage 4 of the site assessment process (CATP.01.01, Appendices D and G). Assessment of each site considered the following factors: accessibility to local bus services, rail stations and service centres; likely impacts on the local road network; site access arrangements and impacts.
45. The site is considered to be in a location that is within walking and cycling distance of the services and facilities of Durrington. Amesbury is within cycling distance however there would need to be upgrades to the cycle routes. The site is in walking distance of bus stops that serve the town centre as well as towns further afield.
46. While residents are likely to use private vehicles, there are opportunities through the planning application stages to ensure that development of the site incorporates infrastructure to improve cycling opportunities (such as garages, sheds and secure bike stands) in accordance with WCS Core Policy 60.

³³ [\[CATP.01\]](#) Wiltshire Council – Amesbury Community Area Topic Paper, Submission version, July 2018

³⁴ [\[EXAM.01.01\]](#) Schedule of Proposed Changes – Consultation Document - September 2018 (Part 1 of 46)

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?

47. The submission version of the WHSAP (WHSAP.01.01³⁵) explains at paragraph 5.12 that allocations are proposed at some settlements that involve a mix of uses or site specific complexities and where it is more appropriate for development to be guided by a master plan approach, as opposed to detailed matters being addressed through policy criteria. There are five sites, of which this site is one, that have been identified as requiring a master plan.
48. The remaining sites are allocated by Policies H2 and H3. Due to their less complex nature, these sites were not considered to require a master planned approach, and thus do not have a specific policy. The supporting text to the allocated sites provides future developers and decision makers with important contextual information regarding matters that will need to be addressed through the planning application process. Indeed, as set out Chapter 5 of the WHSAP (WHSAP.01.01), the Council anticipates that development proposals relating to all allocations will be guided by relevant policies of the Wiltshire Core Strategy (WCO.01³⁶).
49. 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?

50. Yes the Council considers the proposed allocation can be delivered within five years. Wiltshire Council's latest assessment SHELAA³⁷ indicates 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. The more detailed assessment carried out through the WHSAP site selection process has considered a full range of constraints and it has concluded that development is likely to be deliverable within a 5-year timescale. This position has been confirmed by the landowner.

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?

51. 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 (HRA.05.01³⁸, HRA.05.02³⁹,

³⁵ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

³⁶ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

³⁷ [\[SHELAA.02\]](#) SHELAA Appendix 5.1 Amesbury Community Area

³⁸ [\[HRA.05.01\]](#) River Avon SAC - Phosphate IDP (Main Report)

³⁹ [\[HRA.05.02\]](#) River Avon SAC - Phosphate IDP (App A Figs 1-16)

HRA.05.03⁴⁰, HRA.05.04⁴¹) 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 Company's Business Plan Outcome Delivery Incentives). The latter largely achieves phosphate neutrality of itself. The EA and NE therefore have realistic expectations.

52. The SAC Nutrient Management Plan (NMP) (BIO.19⁴²) 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.01⁴³) in a way that was consistent with Habitats Regulations.

53. The role of the NMP (BIO.19) has been supplemented by an Interim Delivery Plan (HRA.05.01, HRA.05.02, HRA.05.03, HRA.05.04) and Wessex Water Outcome Delivery Incentive (see above) as 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).

54. The WHSAP (WHSAP.01.01⁴⁴ and EXAM.01.01⁴⁵) will be delivered alongside the Interim Delivery Plan (HRA.05.01 - HRA.05.04) and Outcome Delivery Incentive. 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 Interim Delivery Plan (HRA.05.01 - HRA.05.04) and Outcome Delivery Incentive 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 (HRA.03⁴⁶) makes clear that on large schemes the Council will seek on site mitigation measures to help mitigate the effects of development. The Interim Delivery Plan (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.

⁴⁰ [\[HRA.05.03\]](#) River Avon SAC - Phosphate IDP (App A Figs 17-40)

⁴¹ [\[HRA.05.04\]](#) River Avon SAC - Phosphate IDP (App B)

⁴² [\[BIO.19\]](#) River Avon SAC Nutrient Management Plan for Phosphorus, April 2015

⁴³ [\[WCO.01\]](#) Wiltshire Core Strategy (January 2015)

⁴⁴ [\[WHSAP.01.01\]](#) Wiltshire Housing Site Allocations Plan - Submission Document, July 2018

⁴⁵ [\[EXAM.01.01\]](#) Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes – Focussed Consultation Document, September 2018

⁴⁶ [\[HRA.03\]](#) Memorandum of Understanding - River Avon Special Area of Conservation Phosphate Neutral Development - Interim Mitigation