

Consultants	Comment	Response
Public Open Space	I note that there is no POS planned on-site as part of this application and the developer is relying on the previous oversupply of POS from S/2005/0211. However, as this application was prior to Unitary I do not have any of the files on what was required as part of that application and what was provided on-site. I would need to see that the oversupply from the existing development was sufficient to meet the requirements generated by the 53 new dwellings in order to accept that there are no POS requirements for this application. If this cannot be demonstrated then off-site contributions would be required to upgrade existing facilities. As the land is designated as POS from S/2005/0211 I cannot add comment on its functionality. The 53 dwellings would generate a requirement for 950m² casual open space, 570m² equipped play space and 3,420m² youth and adult. If the oversupply from S/2005/0211 does not meet these requirements then any remaining requirement would generate an off-site contribution of £34.87 per m² for casual open space, £144 per m² for equipped play and £10 per m² for youth and adult.	The replan has resulted in onsite POS now being present within the application site.
Highways	I am the HDC officer looking after the adoption of the Old Sarum development. I am aware of the site served from Roger Way and the development of this site will enable the footways and junctions in this area to be completed to an adoptable standard. Neither Sherbourne Drive nor Roger Way are yet adopted but they are covered by S38 agreements and are close to adoption. I have no highway objection to the principle of the proposed residential development and wish to make the following observations:- Plot 9 parking is too remote from the dwelling and likely to result in on-street parking. Plot 19 is a 4x bed dwelling and needs 3 parking spaces.	The majority of comments within the highways response are onsite specific, we have undertaken a significant replan and thus these comments are no longer valid to the current layout. However principles raised such as the removal of small areas of grass verge being removed has been applied to the replanned layout. Bunting Lane has been widened to 3.7m however does not propose to have any frontage parking of vehicular access to the proposed dwellings.

	The grass strip adjacent to the visitor space adjacent plot 13 should be hard surfaced not grass. Small areas of grass verge which will eventually become highway are not encouraged and should be hard surfaced, for example between parking spaces 21/22, front of plots 19-21, small section south of plot 30 driveway. I would have no issue with all service strips being tarmacked or paved. I can see the area behind the garage for plot 44 being used for parking when it will be service strip / highway, this area behind the service strip would be better grassed. For areas A & F, it is stated that cycle parking will be within garages or within sheds in private gardens. The vast majority of these dwellings do not appear to have direct access to the highway, so parking within a shed would not be acceptable for them. Please can I request a plan showing visibility splays at all driveways and access road junctions, which can then be conditioned, as I note planting across the frontages. Bunting Lane carriageway must be widened to at least 4.5m to accommodate the additional dwellings. Notwithstanding the regrettable loss of the space allocated for a GP surgery, from a highways perspective I have no issue with the conversion of the vacant space within Building C to form 7 apartments. I note that the parking spaces formerly allocated to the GP surgery will instead be allocated to the apartments which will provide sufficient parking including visitor spaces. Adequate cycle parking should be provided as per the guidance within LTP3 Cycling Strategy.	Cycle sheds are located in rear dwellings with direct access to the frontage of properties facilitated through lockable side gates, this is considered an appropriate method of secure storage. The application is supported by a technical pack that demonstrates through tracking vehicles can traverse the site safely and appropriately. Additional tracking has been provided showing how both fire and refuse vehicles can traverse and manoeuvre within the site. A Travel Plan supports this resubmission.
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	The footway / vehicle crossovers on Crosier Close which serves Building C needs to be finished off to an adoptable standard. Regarding the Travel Plan, I have received the following advice from my Transportation colleague:- As set out in our Travel Plan Guidance https://pages.wiltshire.gov.uk/development-related-travel-plan-guidance.pdf The travel information packs must include a) Salisbury Walking Map b) Salisbury Cycling Map c) Salisbury to Stonehenge bus and cycle map. These are available from the council at a cost of £100 per map i.e. £300 in total The measures currently set out in the Travel Plan are insufficient to realistically achieve the targets and do not meet the standards set out in our guidance. In addition to the measures listed, and in accordance with our Travel Plan guidance, they must provide: • A £300 voucher for cycle purchase (the Green Travel Voucher) to be provided to each household (to be negotiated with a local bike shop) • The taster bus voucher must be a six-month travel pass made available to all households that are not solely composed of concessionary bus pass holders. • The provision of 2 car club vehicles: 1 electric car and 1 electric van. These should be positioned in different locations, so that each site may also provide 1 public electric car charging point adjacent to the car club vehicle (the car chargers can be used for two vehicles). The site may reduce it's car parking provision based on provision of car club vehicles (which they will likely need to do as they don't seem to have provided sufficient cycle parking spaces). Please see Car clubs Connecting Wiltshire for providers – the cost and installation should be negotiated with the provider. • The provision of electric ducting to all parking spaces and garages to enable future provision of electric car chargers. Please also note that footway widths must not be reduced by the provision of current or future electric car chargers so additional width may be needed to accommodate this.	
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New Housing Officer	Policy Requirements: Core Policy 43 of the Wiltshire Core Strategy (as amended by the National Planning Policy Framework) sets out a requirement for 40% on-site Affordable Housing provision within the 40% Housing Zone, on all sites of 10 or more dwellings. Whilst, for the purposes of the Affordable Housing provision, we would usually treat the two sites separately with a 40% Affordable Housing requirement for each site, given that the first and second floors of Block C are already occupied by Affordable Housing Units, it would be appropriate for management reasons that the ground floor also provides affordable units. The Affordable Housing provision on Area A / F will therefore provide the remaining Affordable Housing units to ensure that there is 40% Affordable Housing provision overall. There is therefore a requirement to provide 21 affordable units within a scheme of 53 dwellings. As proposed by the applicant, 7 units should be provided on the Ground Floor of Block C and 14 units in Area A/F. This would meet the policy requirement and would assist in addressing the need for affordable housing in Laverstock and Salisbury where there is a high level of need for both affordable rented and shared ownership housing. Tenure Mix: In order to meet need the affordable housing units should be provided with an overall tenure mix of 60% of the units (13 units) being for Affordable Rented housing, and 40% of the units (8 units) being provided for shared ownership. It should be noted that, as set out in the First Homes Written Ministerial Statement of 24 May 2021, all applications which are determined from 28th December 2021 will be required to provide 25% of the Affordable Housing contribution as First Homes. In this situation, the applicant should agree with the Housing Enabling Team which of the units should be First Homes and should also agree the tenure mix of the remaining Affordable Housing units.	The accepted principle of the provision of the split of affordable units across both Areas A and F remain, however the site has undergone a replan to both areas. Area A/F has been redesigned in order to abate issues relating to impacts from the Football Club in relation to both noise and lighting. To ensure an efficient layout this now includes the provision of ‘FOG’ units which are to be provided within the affordable housing mix. Evidence is provided to support this application that Sage, a registered provider in Wiltshire, would happily take on FOG units and already have many nationwide in their portfolio. The benefits of FOG units are outlined as providing an intermediate property between flats and houses, with the additional benefit of all FOGs on the proposal benefitting from private amenity space. All affordable dwellings proposed are M4(2) compliant and 85% NDSS Compliant as a minimum. Areas A/F now propose the following: <table><tr><th colspan="2">Area A/F</th></tr><tr><td>Affordable Rented:</td><td>Shared Ownership:</td></tr><tr><td>2 x 2 Bed FOG</td><td>2 x 1 Bed Flat</td></tr><tr><td>3 x 3 Bed House</td><td>1 x 2 Bed FOG</td></tr><tr><td>2 x 4 Bed House</td><td>2 x 2 Bed House</td></tr></table>	Area A/F		Affordable Rented:	Shared Ownership:	2 x 2 Bed FOG	2 x 1 Bed Flat	3 x 3 Bed House	1 x 2 Bed FOG	2 x 4 Bed House	2 x 2 Bed House
Area A/F												
Affordable Rented:	Shared Ownership:											
2 x 2 Bed FOG	2 x 1 Bed Flat											
3 x 3 Bed House	1 x 2 Bed FOG											
2 x 4 Bed House	2 x 2 Bed House											

Unit Size Mix:

Core Policy 45 of the Wiltshire Core Strategy states that housing size and type will be expected to reflect that of the demonstrable need for the community within which a site is located. There is currently a need for all sizes of affordable accommodation in Laverstock and Salisbury.

Block C, Old Sarum Local Centre currently provides 14 Affordable Housing units on the first and second floor comprising 5 x 2 bed flats and 2 x 1 bed flats on each floor. It is proposed that the additional 7 affordable housing units will be arranged identically to those proposed on the floors above and should therefore be provided in the following mix to reflect the tenure mix on the floors above:

Block C, Local Centre	
<u>Affordable Rented:</u>	<u>Shared Ownership:</u>
1 x 1 bed, 2 person flats	1 x 1 bed, 2 person flat
4 x 2 bed, 3 person flats	1 x 2 bed, 3 person flat

Whilst the mix proposed on Area A/F is acceptable, I would propose converting one of the 3 bed houses to a 2 bed house to better reflect current need. These units should be provided with the following tenure mix:

Area A / F	
<u>Affordable Rented:</u>	<u>Shared Ownership:</u>
2 x 1 bed / 2 person flats	4 x 2 bed / 4 person houses
3 x 2 bed / 4 person houses	2 x 3 bed / 5 person house
2 x 3 bed / 5 person houses	
1 x 4 bed / 6 person house	

The distribution of the tenures should be indicated on a plan. The applicant should also confirm that the proposed units meet the minimum person criteria in the Affordable Housing mix above as it appears from the House Type Pack that the 2 bed houses may not meet the requirement for 2 bed / 4 person units.

Block C, as is known, is constructed and provides a shell on the ground floor for where the proposed HA units are proposed. The previous floor plans have been superseded and an internal reconfiguration undertaken to ensure that all units are now 85% NDSS compliant.

Private parking is provided for each dwelling and is located within convenient locations that provide direct rear or front access to curtilage whilst retaining a suitable frontage along Bunting Lane.

	There is also a demonstrable need for adapted housing in Laverstock and Salisbury. On all schemes which provide more than 10 Affordable Housing units, it is requested that 10% of affordable units are provided as adapted units in order to help meet this need. These units should be provided as ground floor flats / bungalows to Building Regulations M4(2) standards with a level access shower provided. In this instance it would be appropriate to provide 2 Ground Floor flats as adapted units to meet demonstrable need. Please note that if these are provided in Block C, the applicant should ensure that entry through the communal areas is accessible. The applicant should confirm which units will be provided as adapted units. Minimum Size and Design Standards: Affordable housing in Wiltshire is expected to meet high standards of design and quality, and to be visually indistinguishable from open market housing, taking the following into account: • The Affordable Housing units should be evenly dispersed, in small clusters of no more than 12 to 15 units, within mixed tenure developments. The location of the proposed Affordable Housing units is considered acceptable. • Parking courts are not considered suitable for affordable homes (other than for blocks of flats). Parking should be provided in curtilage or adjacent to the property. I note that the parking for plot 2 does not appear to be well associated with the unit. In addition, there do not appear to be sufficient parking spaces for the 4 bed property (plot 19) In order to ensure that the affordable housing units are eligible for inclusion in Homes England's Affordable Housing programme, we would advise that all affordable homes are built to meet at least 85% of the Nationally Described Space Standard (NDSS) relevant to the dwelling type and minimum person criteria. NDSS and 85% NDSS are shown in the table below:	
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Number of bedrooms	Number of bed spaces	NDSS			Minimum 85% NDSS		
		1 storey (sqm)	2 storey (sqm)	3 storey (sqm)	1 storey (sqm)	2 storey (sqm)	3 storey (sqm)
Studio	1p	39 (37)*			34 (32)*		
1b	2p	50	58		43	50	
2b	3p	61	70		52	60	
	4p	70	79		60	68	
3b	4p	74	84	90	63	72	77
	5p	86	93	99	74	80	85
	6p	95	102	108	81	87	92
4b	5p	90	97	103	77	83	88
	6p	99	106	112	85	91	96
	7p	108	115	121	92	98	103
	8p	117	124	130	100	106	111
5b	6p	103	110	116	88	94	99
	7p	112	119	125	96	102	107
	8p	121	128	134	103	109	114
6b	7p	116	123	129	99	105	110

The applicant should confirm that the Gross Internal Area of the units meet this requirement. It currently appears that the 1 bed flats on Area A/F may be too small and no floorspace measurements have been provided for the flats in Block C.

Transfer to Registered Provider:

The affordable dwellings will be required to be transferred to a Registered Provider, approved by the Council, or to the Council, on a nil subsidy basis. It is strongly recommended that the applicant makes contact with Registered Providers and Wiltshire Council's Residential Development Team as soon as possible in order to discuss the best option for the affordable dwellings including an indication of transfer prices that can be expected. A list of Registered Providers who work in partnership with Wiltshire Council can be provided on request.

Public Protection Officer	Areas A and F <u>Noise:</u> The area of proposed development had been earmarked for B1 use, rather than residential, due to the proximity to the Raymond McEnhill Stadium and concerns about noise rendering the site unsuitable for residential development. With regard to the agent of change principle, although there is existing housing near the stadium this is at a further distance or afforded some protection from noise due to the position of the lower stalls within the stadium. The concern with this site is proximity and that it is directly opposite the main raised level seating area for spectators and club building. I disagree with the outcome of the noise assessment carried out for the applicant to support residential development, that with mitigation measures noise does not pose a material constraint to the development of the site and believe loss of amenity and potential statutory nuisance would be caused to future residents. The noise assessment has considered noise values in ProPG: Planning and Noise, Professional Planning Guidance on Planning & Noise and BS8233:2014. ProPG specifies it relates to sites dominated by traffic noise (not industrial or commercial noise) and although commercial noise maybe risk assessed by ProPG where it is not dominant, this is not the case in this scenario. The predicted levels in the noise report indicate that for some plots, noise during a football match could be 10dB higher than when there is no match, so noise from football is definitely dominant when a Southern League game is being played.	While the original submitted layout was pertinent to disturbances from the adjacent football stadium the proposed replan has designed out any potential impact in respect of noise and lighting arising from the Football Club. <u>Noise</u> Whilst it is recognised the Raymond McEnhill Stadium has a capacity of 5,000 (of which only 500 is seated) the average attendance for league games last year was below 500 per game. Noise surveys were carried out at the league game against Weston Super Mare on the 22nd April 2023, for which there were 711 in attendance, their second highest gate of the season. The supporting noise report produced by Entran concludes that on match days and training noise can be appropriately managed for both internal and external levels with the presence of a suitably weighted 2.5m fence along the eastern boundary of the proposed dwellings. This not only provides a suitable noise barrier but also a suitable interface between the two neighbouring uses. The report further considers the noise levels in respect of events within the bar/function suite and live music within the pitch and models both scenarios and proposes window requirements that will achieve the prescribed internal levels for all modelled scenarios. <u>Lighting</u>
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	Mitigation is suggested so that internal levels within the properties meet the requirements of BS8233:2014. Even with mitigation provided to the windows, that would involve the windows being closed to achieve the target level, a few properties would experience noise levels higher than the recommendations with the windows shut. Outdoor areas would also have noise levels above those suggested by BS8233:2014 extensively across the site during football matches. If the houses were built and occupiers chose to have open windows during a match, the property impacted the worst by noise would experience noise levels of 57 to 62dB internally. The noise predictions in the report are based on a game where there were 700 in the stadium. The capacity of the Raymond McEnhill is 5,000 and so the noise report does not represent the worst-case scenario for noise generation, that would be a full stadium. The Ray Mac Stadium website cites it's largest crowd as 3,408 in May 2013 which would produce greater noise than a crowd of 700. The stadium was built in the 1990's to allow the club to play at league two level, and although they now host Southern League games that have around 700 spectators, the football club aspire to play in higher level leagues. The first team currently play three to five times a month at home but the site also hosts Development Team games, training, and sometimes Ladies team matches. During the closed season six a side-tournaments are held by the youth setup and Walking Football. This month (July), five pre-season friendlies are to be hosted. Although these activities are likely to be quieter than the league games, there is regular noise generated from activity at the stadium. The Ray Mac Stadium also has a premises license that allows live and recorded music as well as other entertainment, both indoors and outside until midnight everyday of the week. This noise hasn't been assessed but the introduction of residential properties would cause loss of amenity and potential statutory nuisance to these residents. <u>Lighting:</u>	The redesign of the proposed has done so to eliminate issues arising from the occasional use of flood lights. As explained within the accompanying cover letter the pitch, design and orientation of the roofs of the dwellings that run alongside the boundary with the football club have sort to mitigate light spill into the proposed development. The accompanying report undertaken by SHD Lighting models lighting impact across the whole development parcel with particular attention paid to the dwellings in close vicinity with frontage towards the football club and concludes that there would be no significant impact on residential amenity.
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	When considering the environmental classification of the site against Guidance Note 1 for the reduction of obtrusive light 2021 (Institute of Lighting Engineers) the lighting statement categorises the site as E2, which I would support. The lighting statement assumes that the lighting at the Ray Mac stadium meets criteria set out in the ILE guidance due to having gained planning permission. The stadium was built in the 1990s and I cannot see any recent applications relating to the lights so this assumption cannot be made. The lighting was assessed by inspecting the lights during the day due to the lights not being in use because of the pandemic, and detail of the lighting scheme is lacking. There is no confirmation that the lighting scheme meets the criteria for an 'E2' area in relation to the proposed housing, therefore it hasn't been demonstrated that the lights at the football club will not cause loss of amenity if the development goes ahead. To conclude, in it's current form, the proposal isn't suitable due to loss of amenity to future occupiers from noise or lighting from the Ray Mac stadium. The council should consider it's commitment to Salisbury Football Club and any curtailment in activities that could occur if a justified noise problem occurs if the development goes ahead. If the developer is determined to use this site for residential development, I would recommend that the applicant negotiate with the owner of the Ray Mac Football Stadium and Salisbury Football club to see what noise and lighting mitigation measures could be introduced at the stadium, that would improve amenity for the proposed housing. The layout of the dwellings in relation to the club could also be examined. Area G	
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	I have no objections to this development on condition that any noise mitigation measures that were applied to the flats on the first and second floors, are replicated within the proposed flats.	
Drainage	Much of the wider development site at Old Sarum has been built out, save for several development parcels earmarked for employment use and a Doctors Surgery, two of which are subject to this application. Therefore, all drainage and highway infrastructure to the residential parcel boundaries have already been provided. Please can you demonstrate and provide evidence that water re-use has been considered and discounted on reasonable grounds? The Wiltshire Council surface water disposal hierarchy is as follows: 1st Re-use, 2nd Infiltration, 3rd watercourse/surface water body, 4th surface water sewer, 5th combined sewer. With regards the control of surface water discharges from greenfield sites, Wiltshire County Council requires post development discharges to provide 20% betterment over pre development discharges for both peak flow and volume. For more information refer to Wiltshire Council's betterment policy update which can be found here. Please can you provide evidence to show that the Wiltshire soakaway guidance guidance has been followed. The surface water drainage strategy must comply with Wiltshire County Council Surface Water Soakaway Guidance, which sets out the standards that must be met for planning approval and adoption. Please can you provide evidence that the MADD factor within MicroDrainage was set to zero?	The FRA produced by Cole Easedon sets out the general principles of the strategy and the interaction with the previous phases that are already complete and occupied/in use. The FRA addendum produced by Simpsons Associates carries forward the principles set out by Cole Easedon in line with the revised layout. Calculations are also provided along with the updated ground investigation carried out in February 2023 which provides infiltration testing specific to this phase.

	Please can you confirm that the Infiltration basins and discharges from these have been previously accepted?																	
Waste	Provision of containers for waste and recycling: The on-site infrastructure required by the proposal is the provision of waste and recycling containers for each residential unit. The following s106 contribution is required for the provision of this essential infrastructure to make the application acceptable in terms of the policies listed below: <table><tr><th>Property type category</th><th>Contribution per house/per category</th><th>Quantity</th><th>Total</th></tr><tr><td>Individual house</td><td>£91</td><td>53</td><td>£4,823</td></tr><tr><td>Bin store for block of 6-10 flats</td><td>£581</td><td>1</td><td>£ 581</td></tr><tr><td colspan="3">Total</td><td>£5,404</td></tr></table> This contribution is directly related to the development and is specifically related to the scale of the development, as it is based upon the number of residential units on site. Policy: Policy support for seeking developer contributions towards the provision of waste management facilities is provided by the adopted Wiltshire Core Strategy, Wiltshire and Swindon Waste Core Strategy and the Wiltshire Planning Obligations Supplementary Planning Document, as detailed in the sections below. Wiltshire Core Strategy – Core Policy 3 (CP3) Core Policy 3 of the Wiltshire Core Strategy (adopted January 2015) provides overarching policy support for securing developer contributions towards ‘waste management services such as recycling and collection facilities’, which is classed as ‘essential infrastructure’. In the event of competing demands for infrastructure provision, essential infrastructure will be afforded the highest priority. Planning Obligations Supplementary Planning Document	Property type category	Contribution per house/per category	Quantity	Total	Individual house	£91	53	£4,823	Bin store for block of 6-10 flats	£581	1	£ 581	Total			£5,404	Bin storage areas are identified on the plan along with collection points for properties that do not have direct frontage onto the development roads, carry distances are shown on the refuse vehicle tracking drawing. It is intended the roads within the site will be offered for adoption. Standardised contributions for Waste are acknowledged and would be included within the draft HoT. The mix and number of units has changed and this will need to be reflected in the S106 request.
Property type category	Contribution per house/per category	Quantity	Total															
Individual house	£91	53	£4,823															
Bin store for block of 6-10 flats	£581	1	£ 581															
Total			£5,404															

	The Wiltshire Planning Obligations Supplementary Planning Document (SPD) (Adopted May 2015) supports Core Policy 3 and provides further detail on the council's approach to developer contributions. The Planning Obligations SPD lists 'waste and recycling containers' as a type of site-specific infrastructure that would be sought through section 106 contributions rather than through the Community Infrastructure Levy (CIL). The provision of bins, and the services required to support waste collection, is a burden on the council that can often be directly related to new developments and hence firmly within scope for financial contributions to be made through s106 agreements. Container provision is directly related to the type and scale of the development, as they are issued on a per-residential-unit basis (except where communal containers are required for apartments sharing the use of bin stores). To meet the requirements of the Written Ministerial Statement on small-scale developers, contributions are not sought for developments which include 10 residential units or fewer. Policy WCS6 of the Wiltshire and Swindon Waste Core Strategy Policy WCS6 of the Wiltshire and Swindon Waste Core Strategy requires developers "to design and provide facilities for occupiers of the development to recycle/compost waste [...] and/or facilities within individual groups of properties or premises for the source separation and storage of different types of waste for recycling and/or composting". Wiltshire Council retains control of procuring containers that are issued to occupiers of residential properties. The reasons for this are to ensure that the containers are compatible with lifting equipment and that branding – which is essential for ensuring that residents know what materials are designated for each container – meets the required standard. As a developer cannot directly provide the facilities for the separation and storage of waste, instead the requirement under WCS6 is met by securing a section 106 contribution.	
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	The same policies provide policy support for ensuring that developments are designed so as to be suitable for delivery of waste collection services. Core Policy 3 states that it is “important that all new development proposals build safeguards into schemes to protect and enhance appropriate services and facilities, including [...] waste collection and management services”. These safeguards can be achieved by allowing suitable space for waste storage and collection operations in accordance with the council’s waste SPD at the outset of the application process. Policy WCS6 requires developers to provide facilities for separation and storage of waste for recycling and composting. It also states that any such provision must “have regard to [...] the existing [...] Municipal Waste Management Strategy”. The council’s waste strategy expects that new developments are designed to enable waste collection services to operate safely and efficiently and, to this end, the draft waste SPD sets out what is deemed to be safe and efficient. Meeting the requirement of WCS6 can be achieved by following the guidance in the waste SPD. Access to waste collection services: I attach a guidance document setting out the council’s technical requirements to ensure that residents will be able to use the standard waste collection service. For information, this document is a draft SPD that will be issued for consultation later this year. In general terms, following the attached guidance will allow the service to operate as intended and generally will mean that plans are acceptable to the waste management services team. The following paragraphs highlight some areas that would need to be addressed at the next stage of an application. <i>Vehicle access</i> Vehicle tracking is required to demonstrate that refuse collection vehicles (RCVs) can move through the development and turn at the ends of roads, especially taking account of cars parked in allocated spaces and at the	
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	roadside. Adequate turning room should be provided to take account of the restrictions on carry distances for residents set out in Part H of Building Regulations (25m), the limitations on carry distances for waste collection crews, where the vehicle should be able to stop within 10m of a collection point (see section 4.4 of the attached guidance) and due to the requirement to minimise reversing to meet the requirements of BS 5906:2005. Tracking on plans in future submissions should demonstrate the sufficiency of vehicle access. The council requires an indemnity in order to operate on any roads that are not adopted, including during any period where the council needs to deliver waste collection services prior to adoption. The required arrangements are set out in section 5.8 of the attached guidance with a sample indemnity provided in Appendix C. <i>Collection points</i> Each dwelling should have a collection point that is on level hardstanding off any roadway or footway at the curtilage of the property, as further described in section 5.2 of the waste SPD. Plans should identify these areas for each dwelling and demonstrate that they do not impact on space available on driveways and that soft landscaping won't prevent or encumber the collection crew when emptying bins. <i>Storage points</i> In accordance with the guidance in section 5.4 of the waste SPD, plans in future submissions should demonstrate that each property has suitable storage space that takes account of the guidance. Showing containers to scale in situ will help to demonstrate compliance. <i>Routes between storage and collection points</i> As noted in the 'Vehicle access' section above, residents should not have to carry their waste containers more than 25m from the storage point to the collection point. Plans should demonstrate that this is achievable for each dwelling, preferably with a supplementary table listing the carry distances per dwelling, for ease of reference. Section 5.3 of the waste	
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	SPD provides further details on matters to consider when designating these routes. <i>The collection service for flats</i> If final designs include communal bin stores for flats, the detailed guidance in section 5.6 of the attachment should be followed. Particular attention should be paid to the location and accessibility of bin stores, as the RCV should be able to park within 10 metres of the store without obstructions and with dropped kerbs in place to enable the bins to be safely manoeuvred to the rear of the RCV. We have experienced problems where poor location, insufficient storage space or doorways of inadequate width mean that services can't be delivered, which impacts on the quality of life of residents as waste accumulates. Final designs should demonstrate how these problems are mitigated. Conditions: I would need to see vehicle tracking to demonstrate that the RCV can move through the development and turn at the ends of roads and show that the RCV would not have to reverse for long distances. Also a s106 contribution of £5,404 toward waste and recycling containers.	
	ASSESSMENT OF: 53 units – 32 open market with no 1 beds and 21 affordable housing (AH) with 4 x 1 beds. EXCLUSIONS/DISCOUNTS APPLIED: all one bed size units are excluded and standard 30% discount for AH applied to remaining 17 units = a further reduction by 5 units. NUMBER OF PROPERTIES QUALIFYING FOR ASSESSMENT: 44 PLACES NEEDED BY DVLPT: PRIMARY: 14 SECONDARIES: 10 DESIGNATED AREA PRIMARY/IES: • Old Sarum Primary School. • The new primary planned for the Longhedge development will also be within a 2-mile safe walking distance of the proposed development site.	Standardised contributions for Education are acknowledged and would be included within the draft HoT. The mix and number of units has changed and this will need to be reflected in the S106 request.

DESIGNATED AREA SECONDARY/IES:

- Laverstock secondaries – St Edmund’s CE Girls, St Joseph’s RC, Wyvern Boys.
- Sarum Academy.

EARLY YEARS ASSESSMENT DETAILS:

- There are currently 2 preschools and 0 childminders within a two-mile safe walking route of this proposed development.
- This provision is operating at high capacity.
- The Local Authority has a duty to provide sufficient childcare for working parents under Section 6 of the Childcare Act 2006.
- Therefore, any increase in population as a result of this development will require additional childcare provision.
- Based on the 44 qualifying properties:

Number of units	2 year olds and below 4 places per 100 dwellings	3 & 4 year olds 9 places per 100 dwellings	Total of places	Total required:
44	2	4	6	£17,522 x 6 = £105,132

EARLY YEARS CONTRIBUTIONS REQUIREMENTS: Current pupil products: 0.04 per dwelling for 0-2-year olds (4 per 100 dwellings) and 0.09 per dwelling for 3-4-year olds (9 per 100 dwellings). Current capital cost multiplier = £17,522 per place. *(Please note that this figure is due to be reviewed and updated shortly, for the 2021/22 financial year, and the latest multiplier will then apply to an S106 agreement. So, the contributions stated below are indicative figures only).

- Total required as per calculations above = £105,132 towards the development of Early Years provision in this area.
- This contribution is to be subject to indexation and secured via a Section 106 Agreement, to which the Council’s standard terms will apply.

PRIMARY ASSESSMENT DETAILS:

	• Capacity: 607 places. (This includes in area places already secured by S106). • Jan 21 census number on roll: 304 pupils. • Peak forecasts/numbers: 333 pupils in September 2023. (This figure includes any approved • in area housing already underway/completed). • In addition to this, current demand from new housing already registered/approved in this area but not yet started or in forecasts, requires a total of a further 110 places. • So, capacity is currently available. PRIMARY CONTRIBUTION REQUIREMENTS: Current primary cost multiplier = £18,758 per place. *(Please note that this figure is due to be reviewed and updated shortly, for the 2021/22 financial year, and the latest multiplier will then apply to an S106 agreement. So, the contributions stated below are indicative figures only). • A substantial number of places are currently available. • These can therefore be offset against this application's need for a total of 14 places. • As a result, we have no requirement from this application for a developer contribution towards expanding primary school infrastructure. SECONDARY ASSESSMENT DETAILS: <i>Aggregated data for the three Laverstock secondaries and neighbouring Sarum Academy:</i> • PAN years 7 – 11 total capacity = 3360 places. (This includes additional capacity to be provided at Sarum Academy that's already secured by S106s.) • Jan 21 Years 7 -11 number on roll = 2317 pupils. • Latest forecasts peak at 2650 pupils in 2025 (includes approved housing completed/underway). • This equates to 710 places being available across the schools.	
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	- The latest total for additional places required by in area housing already registered/approved but not yet built out & so not yet in forecasts = 579.3 - So, there are places available across the relevant area secondary schools. SECONDARY CONTRIBUTION REQUIREMENTS: Current secondary cost multiplier = £22,940 per place. *(Please note that this figure is due to be reviewed and updated shortly, for the 2021/22 financial year, and the latest multiplier will then apply to an S106 agreement. So, the contributions stated below are indicative figures only). - There is currently spare capacity available across the schools in this area. - As a result, we have no requirement from this application for a developer contribution towards expanding secondary school infrastructure.	
Wessex Water	Wessex Water is not the incumbent undertaker for the area surrounding the two plots, the applicant will need to seek confirmation from the incumbent undertaken for discharge of foul and surface water and for new water supply. Wessex Water does have some assets within the area of Osmund Walk at the South East boundary of the Block C Site.	No objection raised.
	I cannot get a clear understanding from the plans of the boundary treatment for the south west area where the development abuts the football ground. I note from the Design and Access Statement that the existing hedge will be retained and added to. However, there appears to remain what is in effect an alleyway between the side of the homes and the football ground. I would ask that this boundary be fenced. The remaining alleyways giving access to the rear of terraced homes must be provided with an additional locking gate at the building line to remove hiding places for offenders and to protect the vulnerable rear of these homes and protect the residents and their property, especially property within gardens and garden buildings. These gates are also required at the building line at the	The boundary treatment for the proposed is contained within the Fencing and Enclosures plan and shows a suitable mix of fencing where required and retained hedging to create a soft boundary. Locking gates have been provided at the building line where plausible and required. Further comments provided were plot specific however the significant layout changes mean these are no longer present.

	side of plots 14, 22 and 31 for the same reasons. The parking for plots 36 – 39 and plots 44, 45 and 46 are hidden in a rear courtyard parking area with no surveillance. The Design and Access Statement, page 39 states ‘in all incidences parking is in proximity to the host dwelling, well lit and overlooked’. This is clearly not the case. I would ask for either the orientation of plots 36 – 39 be changed to have them looking into the parking courtyard, or the parking arrangements for these plots be changed to ensure the safety of the vehicles, their contents and the safety of the persons using them. Research shows that unsupervised rear courtyard parking is frequently not used with owners preferring to leave cars on the street. This in turn causes obstructions and can lead to neighbour disputes. I have concerns that the area beside plot 13 will become a congregation area due to its position beside a visitor parking space and the high density of the immediate housing. I would ask that the boundary fence for plot 13 be moved out further towards the road, increasing the garden and reducing the green area of public open space. Failure to reduce this area could have a detrimental impact on the quality of life of the occupants of plot 13. The National Planning Policy Framework (NPPF) defines three fundamental objectives to achieving a sustainable development: economic, social and environmental (NPPF, page 5, para 8). Crime has a direct impact on all three objectives. This has been reinforced throughout the NPPF where the government makes clear its view of what sustainable development, in England, means in practice for the planning polices, and decisions should aim to achieve healthy, inclusive and safe places which....are safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion’. Furthermore, section 8, para 95 states ‘Planning policies and decisions should promote public safety and take into account wider security and defence this includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.	
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	Similarly the NPPF Para 124, states ‘Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people; paragraph 127 (f) states that ‘planning policies and decisions should aim to ensure that developments create places that are safe, inclusive and accessible where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience With the publication of the accompanying National Planning Practice Guidance (NPPG) the government has reiterated that designing out crime and designing in community safety should be central to the planning delivery of new development. Specifically the Planning Practice Guidance on design reminds practitioners that local authorities are duty bound to adhere to Section 17 of the Crime and Disorder Act 1998 and exercise their functions with due regard to their likely effect on crime an disorder, and do all that they reasonably can to prevent crime and disorder. Furthermore, practitioners are also reminded that the prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and country Planning legislation. Paragraph 10 of the NPPG states; planning should address crime prevention – designing out crime and designing in community safety should be central to the planning and delivery of new development. It goes further stating that crime should not be seen as a stand-alone issue, which is why guidance on crime has been embedded throughout the guidance on design rather than being set out in isolation. In addition, Core Strategy; Core Policy 57 Ensuring high quality design and place shaping states ‘A high standard of design is required in all new developments (viii) - Incorporate measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area’. I ask that the issues I raise be addressed to ensure all opportunities for designing out crime within the development are utilised.	
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	I would be happy to discuss these issues with the developer should they wish and offer my services, free of charge.	
Archaeological	Thank you for your consultation. This site was included within the archaeological evaluation of a larger area in 2006, that included much of the housing and leisure facilities that now surround it. A single evaluation trench was excavated within what is currently determined as Areas A&F and did not recorded any archaeological features. I note that the Heritage Assessment (which has been included among the supporting documentation attached to this application) sees the negative results from this single trench as grounds for not carrying out any further archaeological work within the site. I disagree with this conclusion. A single trench within an area this size is wholly ineffective in assessing the archaeological potential of the site and I note that trenching to the north east of the site recorded a series of undated pits that extended into the proposed development area itself. Considering the high archaeological potential of the immediate area around this under-evaluated site (with Bronze Age funerary monuments and later prehistoric settlement to the north east), I would advise that a further trial trench evaluation be carried out, this work to be secured via a condition attached to any planning permission that may be issued. Such a condition should be worded thus: 'No development shall commence within the area indicated by application PL/2021/04084 until: a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and b) The approved programme of archaeological work has been carried out in accordance with the approved details. REASON: To enable the recording of any matters of archaeological interest.' The evaluation should be conducted by	This comment is noted and is to be discussed with the planning officer and archaeologist during determination.

	qualified archaeologists following the standards and guidelines for such works as set out by the Chartered Institute for Archaeologists (CIfA). The costs of the work are to be borne by the applicant. In regard to the change of use of buildings in Area G, there are no archaeological issues that I would wish to raise in this instance.	
Spatial Planning	<u>Principle of Development</u> Residential development of 53no. new dwellings comprising development on land to the west of Roger Way (Areas A&F), alongside the change of use of the vacant ground floor unit at Block C of the Old Sarum Local Centre (Area G), to provide for 7no. affordable apartments. At Old Sarum, in the vicinity of the application site, there have been several significant planning permissions for principally residential development (including at Longhedge). In terms of assessing the relative merits of the proposal, the starting point is the development plan and specifically the Wiltshire Core Strategy. In this regard, the settlement strategy is set out in Core Policy 1 of the Wiltshire Core Strategy (WCS). Salisbury is defined in Core Policy 1 as a Principal Settlement, based on an assessment of its role and function. Core Policy 2 sets out the delivery strategy for growth for the period 2006 to 2026 and aims to distribute development in a sustainable manner. Within the defined limits of development for settlements there is a presumption in favour of permitting sustainable development. Development proposals outside these defined limits would not be supported, except in certain specified circumstances set out in paragraph 4.25 of the WCS, none of which apply in this case. The policy goes on to emphasise the point that these limits of development may only be altered through the identification of sites for development through subsequent plan policy.	Spatial planning has provided no objection and confirms that area A/F are not protected employment land. The proposed residential scheme provides a suitable use of land within Salisbury's development limit.

	The limits of development applying to Salisbury have been comprehensively reviewed through the Wiltshire Housing Site Allocations Plan (WHSAP), which was adopted in February 2020. The development site lies within newly revised limits of development for Salisbury and therefore the presumption in favour of sustainable development applies. Of additional relevance to the consideration of this proposal is Core Policy 20 which deals specifically with Salisbury. CP20 anticipates that approximately 6,060 new homes will be delivered across Salisbury over the plan period 2006 to 2026. The latest Housing Land Supply Statement (base date 1 April 2019) shows that 5,631 homes have either been completed or were developable commitments. Whilst this demonstrates a slight shortfall, permissions have been ongoing with further new housing coming on stream for Salisbury, including: - Castle Street, Salisbury (66 units) - Longhedge, Old Sarum (65 units) Two further elements are key to this decision. One on retention of employment land, the other on adequate provision of community facilities at the Local Centre. The land in question is not defined in the Wiltshire Core strategy as a Principal Employment Area (CP20); were this the case, the land subject to this application would need to be protected for such purposes. As regards community facilities Early Years provision may be required in the vicinity of Old Sarum. Whilst it is believed that such provision may be provided at nearby Longhedge, the latest position on this should be obtained from the competent department within Wiltshire Council. In March 2019 the Council approved a detailed planning application for a new local centre (19/01690/FUL) at Longhedge, Old Sarum. The approved development includes a Class A1 retail convenience store, three other A1-5/D1	
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	units and a children's nursery (Wiltshire Retail and Town Centres Study, Avison Young, 2020) Similarly, GP surgeries are also required across the area (NHS Primary Care, 2020). Once again, whilst it is believed that relevant provision may be provided within the context of the Longhedge development, confirmation should be obtained. <u>Five-year housing land supply</u> The NPPF, within the context of a presumption in favour of sustainable development, aims to significantly boost the supply of housing. It requires local planning authorities to identify a supply of specific, deliverable sites able to provide five years' worth of housing land supply. The NPPF makes it clear that, where this cannot be demonstrated, the most important policies for determining the application are deemed to be out-of-date, and planning permission should be granted - unless: i. the application of policies in the NPPF that protect areas or assets of importance provides a clear reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The Council's current 5-year housing land supply position (base date 1 April 2019) is 4.56 years. Under the provisions of NPPF para 73, the above has been calculated against the Local Housing Need since Wiltshire's strategic housing policies are now in excess of five years old. This notwithstanding: - i although the WCS is over 5 years old, this does not render the plan out-of-date and is still the starting point for determining planning applications; - ii the current Local Housing Need figure (2,006 dwellings per annum) is very similar to the sum of the housing requirements for the three HMAs in the adopted policies of the WCS (2,055 dwellings per annum), indicating that the	
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	housing requirement in the WCS continues effectively to represent the current housing need for Wiltshire (also refer to Briefing Note 20-37). Five-year housing land supply and decision-taking Paragraph 11(d) and footnote 7 of the NPPF state that where an LPA cannot demonstrate a 5YHLS of deliverable sites, for applications including housing provision, the policies which are most important for determining the application should be considered out-of-date. As a result, the presumption in favour of sustainable development (often referred to as the ‘tilted balance’) should be applied and permission should be granted unless protection policies set out in footnote 6 of the NPPF apply, or the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits. In this scenario officers will need to carefully consider decisions on housing proposals. This means balancing the need to boost housing supply against any adverse impacts of the proposal, considered against the development plan as whole, and any material considerations on a case-by-case basis. This will need to include consideration of what weight to assign to the most important policies. The extent of the 5-year housing land supply shortfall and the potential for the proposal to deliver housing in the current 5-year period to help remedy the current shortfall should also be considered in the balancing exercise. Conclusions The proposal lies within Salisbury urban area’s development limits and seeks to generate housing on land designated for employment uses. In spite of the employment land designation, the location in question is not a protected ‘principal employment area’ within the development plan and has not hitherto attracted employment-generating uses. Finally, whilst the Council is unable to demonstrate a 5YHLS, careful consideration should be applied as regards balancing the need to boost housing supply against other impacts of the proposal, most notably in respect	
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	of community facilities and the aims of ensuring sustainable communities. The potential loss of community space at this location is dependent upon suitable and adequate provision being secured within the local area.	
Environment Agency	We have no objection to the proposed development, however please include the following conditions in any permission granted. Water Efficiency and Climate Change The incorporation of water efficiency measures into this scheme will: - contribute to climate change resilience by minimising the impacts of drought (cumulatively) - reduce abstraction pressure on water resources and riverine ecosystems - benefit future residents by reducing water bills. The following condition has been supported in principle by the Planning Inspectorate. CONDITION No development approved by this permission shall commence until a scheme for water efficiency has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the agreed details. REASON In the interests of sustainable development and climate change adaptation. INFORMATIVE The development should include water efficient systems and fittings. These should include dual-flush toilets, water butts, water-saving taps, showers and baths, and appliances with the highest water efficiency rating (as a minimum). Greywater recycling and rainwater harvesting should be considered. An appropriate submitted scheme to discharge the condition will include a water usage calculator showing how the development will not exceed a total (internal and external) usage level of 110 litres per person per day. NOTE TO LPA	No objection has been raised. The resubmission is supported by a Site Investigation removing the need for this to be conditioned.

	By ensuring that any scheme submitted meets the standards given above you do not need to consult the Environment Agency on discharging the above condition. Potential Land Contamination The previous uses for Area 1 have not been made clear in the planning documents; from aerial photography it looks like it may have been previously used as it appears to have been cleared. Unless the applicant can provide detail and evidence that the site is unlikely to be contaminated we request the following conditions to address the possibility of contaminated land at the site. CONDITION No development of Area 1 approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components: 1. A preliminary risk assessment which has identified: a. all previous uses b. potential contaminants associated with those uses c. a conceptual model of the site indicating sources, pathways and receptors d. potentially unacceptable risks arising from contamination at the site 2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site. 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.	
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	4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved. REASON To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework. Construction Environmental Management Plan (CEMP) CONDITION No development approved by this permission shall be commenced until a Construction Environmental Management Plan, incorporating pollution prevention measures, has been submitted to and approved by the Local Planning Authority. The plan shall subsequently be implemented in accordance with the approved details and agreed timetable. REASON To prevent pollution of the water environment INFORMATIVE The submitted CEMP must include safeguarding measures to deal with the following pollution risks: - the use of plant and machinery - wheel washing and vehicle wash-down and disposal of resultant dirty water - oils/chemicals and materials - the use and routing of heavy plant and vehicles - the location and form of work and storage areas and compounds - the control and removal of spoil and wastes.	
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