

Persimmon Homes Wessex

Verona House

Tetbury Hill

Malmesbury

SN16 9JR

Tel: 01666 824721

Dear Mr Richardson,

RE: PL/2021/04084 Residential development of 49 no. 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.

I am pleased to provide the resubmission to application PL/2021/04084 for 49 dwellings at Land to the west of Roger Way and Old Sarum Local Centre.

This resubmission seeks to address consultee comments from highways, ecology and public protection. Minor changes have been made to the scheme to address the comments raised by highways whilst further analysis of the proposed is provided to address public protection.

Highways provided comment on 18 September 2024 and the following amends have been made in respect of those comments:

- bollards added to the entrance to Bunting Lane to restrict vehicular traffic;
- landscaping adjacent to driveways was previously *Fagus Sylvatica* which grew to 600-800mm now proposed as *Euonymus* which will not exceed 600mm;
- inclusion of a 500mm buffer strip around the internal loop road of the site has been added should the road sought to be adopted in the future.

Ecology provided comment on 19 February 2025 with a request for the resubmission of the proposed using the latest nutrient calculator. This has been remodelled, and the resultant nutrient output remains the same as previously modelled at 4.77kg TP/year.

The ecology comment further asks for justification as to why water usage modelled per day is below 120 l/p/d. Within our report we have provided the water usage sheet which shows our house types usage and further includes a buffer. In line with our other developments in Wiltshire we are regularly conditioned to ensure that water consumption is limited to 110 l/p/d to ensure they meet the higher building standard Part G and thus the dwellings proposed have been designed to ensure this level is adhered to.

Public protection provided comment on 1 November 2024 that provided an objection on the grounds of light and noise intrusion on proposed dwellings from the adjacent football ground. The comment states that the application does not provide sufficient vertical illuminance to model illuminance levels on habitable rooms within dwellings.

The revised information today seeks to provide further clarification in relation to perceived light spill by providing the requested vertical illuminance levels. The report from SHD Lighting takes in consideration the public protection officer comments and concludes that:

- The scheme has been carefully designed to minimise potential impacts on the amenity of future occupants from existing floodlighting. In particular, the plots closest to the football ground have been designed without external windows on facades facing the pitch. Additionally, a 2.5m high timber noise fence along the boundary will provide further mitigation against light spill.
- Notwithstanding these measures, this report acknowledges that windows at Plots 1-2, 15-17, and 23-28 are likely to experience light levels exceeding 5 lux during evening matches at Salisbury FC. All affected plots are to be sold on the open market and do not form part of the Affordable Housing provision.
- During the 2023/24 season, Salisbury FC hosted three evening matches.
- Should the local planning authority consider the impact on these plots to be significant, it may wish to impose a planning condition requiring the submission and approval of a scheme for installing window coverings or blinds for affected plots.

As we have maintained we disagree with the public protection comments in relation to the potential impact of noise originating from the neighbouring football ground on residential amenity. We acknowledge the further response received 1 November 2024 and maintain the findings of the Noise Assessment (Entran, August 2024) that can be summarised as following:

- recommendations for thermal and acoustic double glazing be employed to will result in ambient day time noise levels below 35db and nighttime below 30db – in line with national guidance BS8233:2014;
- recommendations for 2.5m high noise barrier to ensure outdoor noise limits remain below 55db – in line with WHO guidance;
- the acceptance of the Council's public protection officers on the principle of closed windows for noise mitigation on other recently consented schemes (PL/2023/04469 and PL/2023/04928)

The consultant concludes by stating that in light of the proposed mitigation noise does not pose a material constraint on the proposed development.

The additional concerns raised by the public protection in the response received 1 November 2024 such as those around 'pitch maintenance noise' appear to be a generic comment with no specific evidence provided in relation to this application.

Nationally it has been well publicised there is a drive to build houses and that is reflected in the latest National Planning Policy Framework published 12 December. Paragraph 11 explains that where the presumption is engaged, the decision taking process at paragraph 11(d) should be applied.. In such circumstances planning permission should be granted unless:

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development towards sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination

Footnote 8 of the Framework confirms that the presumption is engaged on applications involving the provision of housing where the local planning authority cannot demonstrate five years' worth of

deliverable housing sites, or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

On 17 December 2024 Wiltshire Council issued a 'Housing Need Policy Update' which confirmed that Wiltshire has a 2.03 year housing land supply against the national requirement of 5 years. The presumption in favour of sustainable development is therefore engaged on this application.

Wiltshire Council are clear in their own published (17 December 2024 'Housing Need Policy Update') directive is now to employ an altered weight when giving consideration to planning application in relation to residential development to support the boost for supply. When addressing the substantial shortfall the balance needs to be considered against any adverse impacts.

The correct application of paragraph 11(d) is to consider whether any adverse impacts of the proposed development would significantly and demonstrably outweigh the benefits – the 'planning balance' (11(d)(ii)).

The application is considered to propose the following benefits:

- Provision of 49 new high quality residential dwellings;
- A proposed range in size of dwellings that seeks to provide a suitable mix to cater to the needs of the local community;
- 20 affordable dwellings with size and tenure decided by the Council's officers that will suit the local requirements;
- Re-use of a longstanding vacant building into residential use;
- A sustainable location proposed within a wider established residential area with;
- Above 10% Biodiversity Net Gain;

In addition to the above benefits the application demonstrates consultants continued confidence in their findings that noise does not pose a material constraint on the proposed with adequate mitigation proposed, this must be a serious consideration when looking at the decision in the planning balance.

Set within the context of the requirements of Paragraph 11d of the Framework, it is considered that the presumption in favour of sustainable development applies and planning permission should be approved.

Any questions on the application please let me know.

Kind Regards,

Barnaby Harris

Senior Planner