

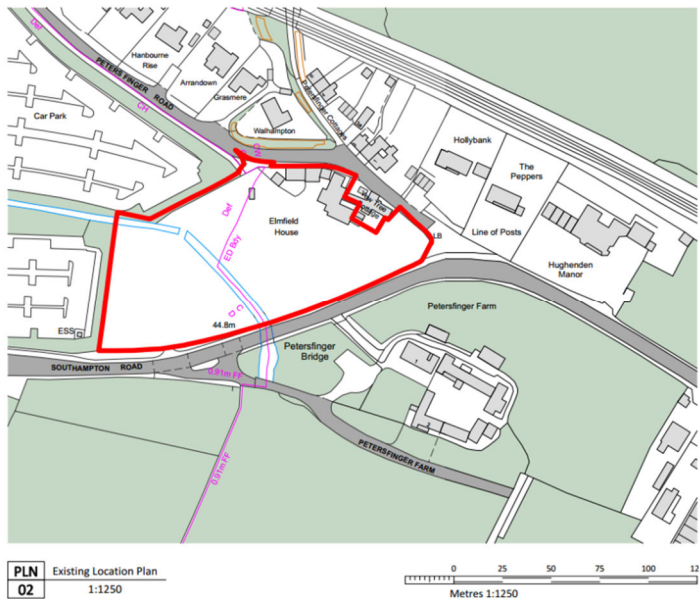
APPLICATION FOR FULL-PLANNING PERMISSION

CASE OFFICER REPORT

APPLICATION REFERENCE:	PL/2023/10495
APPLICATION TYPE:	Full planning permission
SITE ADDRESS:	Elmfield House, Petersfinger, SP5 3BZ
DEVELOPMENT DESCRIPTION:	Conversion of Elmfield House and outbuildings to 6 x dwellings and the erection of 15 dwellings, hard and soft landscaping and associated works
RECOMMENDATION:	Refuse

SITE DESCRIPTION/CONTEXT

The application site comprises Elmfield House and its associated outbuildings and extended amenity land. The southern end of the site was formerly used as a paddock and is separated by a stream and bridge. The application site lies to the east of Salisbury and is adjacent to the Petersfinger Park and Ride. The A36 is immediately to the south, whilst Yewtree Cottage is positioned adjacent to Elmfield House but does not form part of the application. Access is achieved through an existing driveway off Petersfinger Road.



The application site is subject to the following constraints:

- Special Landscape Area
- Major Groundwater Vulnerability
- Area susceptible to ground water flooding
- Archaeology settlement line, and palaeolithic burnt flint site
- New Forest Protected Sites 13.8km recreation zone of influence

In 2019, a planning application was submitted to Wiltshire Council seeking outline permission for the '*Construction of residential units*'. This application concerned the western portion of the Elmfield House site. The application was approved on 27th January 2021.

In September 2021, an application seeking to approve the reserved matters from the outline consent was submitted to Wiltshire Council. The description of the application was '*Reserved*'

Matters application relating to 19/00967/OUT (Construction of residential units) relating to access, appearance, landscaping, layout and scale'. The application was approved by Wiltshire Council on 21st June 2022.

PROPOSAL

The application seeks permission for 21 dwellings, comprising the conversion of Elmfield House and outbuildings to form 6 dwellings, and 15 new dwellings. It is proposed that this would be in the form of 2, 1 bedroom flats, 2, 2 bedroom flats, 2, 3 bed semi-detached dwellings, 12, 3 bedroom detached dwellings, and 3, 4 bedroom detached dwellings.

PLANNING HISTORY

Proposal / Summary
19/00967/OUT - Outline Planning Decision - Approve with Conditions Date: 27/1/2021 – Construction of residential units
PL/2021/07611 - Approval of reserved matters Decision - Approve with Conditions Date: 21/6/2022 – Reserved Matters application relating to 19/00967/OUT (Construction of residential units) relating to access, appearance, landscaping, layout and scale
S/1988/0844 - Outline Planning Decision - Refused Date: 22/6/1988 – O/L APPLICATION - NEW DWELLING, ACCESS FROM EXISTING DRIVE
S/1998/1426 - Full planning permission Decision - Withdrawn Date: 23/1/2004 – APPLICATION FOR CERTIFICATE OF APPROPRIATE ALTERNATIVE DEVELOPMENT FOR: A1 - RETAIL A2 - PROFESSIONAL AND FINANCIAL SERVICES A3 - RESTAURANTS PUBS ETC B1 - OFFICES RESEARCH AND DEVELOPMENT AND LIGHT INDUSTRY B2 - GENERAL INDUSTRIAL B8 - WAREHOUSING
S/2006/0122 - Full planning permission Decision - Approve with Conditions Date: 21/9/2007 – FORMATION & LAYING OUT OF CAR PARK TO PROVIDE PARK & RIDE FACILITY. ERECTION OF ANCILLARY BUILDINGS AND STRUCTURES. FORMATION OF NEW ACCESS TO A36 & ASSOCIATED ENGINEERING WORKS. CLOSURE OF EXISTING JUNCTION OF A36 WITH PETERSFINGER ROAD TO MOTORISED TRAFFIC & FORMATION OF NEW JUNCTION TO PETERSFINGER ROAD WITH ACCESS ROAD TO PARK & RIDE SITE.
S/2008/1762 - Full planning permission Decision - Refused Date: 2/12/2008 – TWO STOREY REAR EXTENSION
S/2009/0355 - Full planning permission Decision - Approve with Conditions Date: 28/4/2009 – RESIDENTIAL TWO STOREY REAR EXTENSION

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Statutory Legislation:

National Planning Policy:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide

Development Plan:

The development plan for Wiltshire comprises the *Wiltshire Core Strategy (WCS) (adopted January 2015)* and any made neighbourhood plans, which remains the principal statutory planning document guiding development across the county. In line with Section 38(6) of the

Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

The adopted Wiltshire Core Strategy (WCS), with particular regard to:

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 3 Infrastructure Requirements;
- Core Policy 23 Southern Wiltshire Community Area;
- Core Policy 41 Sustainable Construction and Low-Carbon Energy;
- Core Policy 43 Providing Affordable Homes;
- Core Policy 45 Meeting Wiltshire's Housing Needs;
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 51 Landscape;
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58 Ensuring the Conservation of the Historic Environment;
- Core Policy 60 Sustainable Transport;
- Core Policy 61 Transport & Development;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 63 Transport Strategies;
- Core Policy 64 Demand Management;
- Core Policy 67 Flood Risk;
- Core Policy 68 Water Resources;
- Core Policy 69 River Avon SAC.

Supplementary Planning Documents and other Guidance:

- Wiltshire Design Guide (adopted April 2024)
- Wiltshire Local Transport Plan 2011-2026, adopted 2015 - including the Car Parking Strategy and Cycling Strategy, adopted 2015
- Wiltshire Council's Waste Core Strategy, adopted July 2009
- Wiltshire Council's Waste Storage and Collection: Guidance for Developers Supplementary Planning Document, January 2017
- Art and Design in the Public Realm in Wiltshire – 2024 Guidance – adopted May 2024
- A Green & Blue Infrastructure Strategy for Wiltshire: Wiltshire's Natural Environment Plan 2022-2030
- Wiltshire Local Cycling and Walking Infrastructure Plan (LCWIP)
 - Active travel infrastructure design standards 2022
 - Active travel parking standards and design guide 2022
- LTN1/20 – Cycle Infrastructure Design (July 2020)
- Air Quality SPD (July 2023)
- Wiltshire Housing Site Allocations Plan, adopted 25 February 2020
- Open Space provision in New Housing Developments – A Guide (Supplementary Planning Guidance) and Wiltshire Council's Playing Pitch Strategy February 2017

Other Relevant Policies and Documents

- Wiltshire Council's latest published Housing Land Supply Statement
- Wiltshire Local Transport Plan 2011-2026, adopted 2015 - including the Car Parking Strategy and Cycling Strategy, adopted 2015
- Wiltshire Local Cycling and Walking Infrastructure Plan (LCWIP)

Draft Wiltshire Local Plan:

At Full Council on 19 May 2026, the elected members of Wiltshire Council agreed to withdraw the emerging Wiltshire Local Plan. The said Plan has no material weight for the purposes of the application.

In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2026, on 30th June 2026 Wiltshire Council published a notice of intention to prepare a new local plan for Wiltshire. The next stage is a Scoping Consultation which commences on 2nd September 2026. This plan is at a very early stage and currently carries no weight for decision making.

ISSUES

The main issues that need to be addressed in this case include:

- Whether the proposal constitutes EIA development
- Whether the proposals needs Habitats Regulations Assessment
- Whether the development is acceptable in principle (CP 1 and 2)
- Whether the scheme constitutes high quality design (CP 57)
- Whether the scheme would have an acceptable impact upon the reasonable living conditions of the adjoining occupants (CP 57)
- Whether the scheme would preserve or enhance the historic environment (CP 58)
- Whether the scheme would have an acceptable landscape impact (CP 51)
- Whether the proposal would have a negative effect upon highway safety, including if there is sufficient parking for the proposed development (CP 61 and 64)
- Whether the site can be adequately drained without increasing flood risk elsewhere (CP 67)
- Whether there would be any harmful impacts upon protected species or priority habitats (CP 50)

CONSULTATION RESPONSES

The views of consultees are material considerations in the determination of the application. However, the decision-maker must exercise their own planning judgement. Where consultees raise concerns or recommend conditions, these have been considered and are addressed within the assessment section of this report.

WC Highways: Objection, following submission of revised details, summarised below:

- The revised proposals are an improvement and have resolved some of the previous highway issues raised.
- no new footway has been proposed along Petersfinger Road, towards the junction with New Petersfinger Road, and is considered a fundamental highway safety issue with this proposal, that will attract an adverse Highway recommendation

- In terms of the site access, this has not changed significantly from previous and is considered sufficient for the scale of development. The visibility slays will require the significant removal of vegetation to the North of the access.
- The footways widths are narrower than standard, however, the nature of the site is that the carriageway can act as shared use and I do not envisage any safety issues with the internal road layout as designed. I also note that the bridge narrowing has been increased to facilitate fire appliance access as requested.
- I am aware of National Highway's comments in respect to the pedestrian link to the A36T and I support their views on this. The pedestrian connection is now shown at 2m width within the site, which is positive.
- Every plot has been provided with adequate car parking provision to meet Wiltshire's Standards in full, including four unallocated visitor car parking spaces. I still do not believe that the rear communal car parking area for the converted units is ideal, given the distance from the building, however, the numbers do meet policy requirements.
- A construction access is proposed from the A36T and I note that National Highways are seeking additional details in respect to this. A 'Phase 2' access has also been proposed from the end of Petersfinger Road, however, I do not believe this is realistic given the width of the road at this point.
- Therefore, I seek revised plans showing the provision of a new footway from the site access to the junction with New Petersfinger Road, prior to making a formal Highway recommendation. If revisions are not forthcoming, I can provide refusal reasons on request.

A reason for refusal was requested and provided below:

'The main issue is in respect to the increase in traffic and the increased risk this will cause for pedestrians due to the lack of pedestrian facilities on Petersfinger Road. This could be easily overcome through provision of a short section of footway and new connection through to the Park & Ride site, with onward footpaths available toward Tesco etc. Given that the applicant has not sought to address the concerns raised in respect to the impact of the increased levels of traffic and associated concern for pedestrian safety, I recommend that the application is refused for the following reason;

Petersfinger Road lacks any pedestrian facilities along a key section of the route and the increase in traffic generated by the development will increase the risk to pedestrians walking within the carriageway and thus, be to the detriment to highway safety in the area. The development will also likely increase pedestrian trips towards the key facilities towards the North along Petersfinger Road, further increasing the risk of conflict between vehicles and pedestrians. This proposal is therefore contrary to NPPF Policies TR3 and TR4, and Wiltshire Core Strategy, Core Policies 57, 60 and 61.'

National Highways: Recommend that planning permission not be granted for a specified period;

- National Highways has provided previous responses to the planning authority dated 30 January and 30 July 2024, and 30 January and 30 July 2025, requesting further information
- National Highways reviewed the updated documents provided but considers that further information is still required, to enable full understanding of the impact of the development on the safe and efficient operation of the A36 trunk road. Further details requested as below:
 - a preliminary design for the proposed pedestrian/cycle access onto the A36, its means of connection with the existing footway and its suitability for shared use

- the proposed surface water drainage and foul sewage arrangements, their impact on the existing National Highways culvert structure and National Highways means of access for maintenance purposes
- Landscaping, boundary treatments, construction traffic management and construction access arrangements could be addressed by planning conditions.
- National Highways recommends that Wiltshire Council does not grant planning permission in respect of planning application reference PL/2023/10495 for a period of up to 6 months from the date of this recommendation.

15/07/2026 Further comment submitted:

National Highways recommends that Wiltshire Council does not grant planning permission in respect of planning application reference PL/2023/10495 for a period of up to 6 months from the date of this recommendation.

This is to allow time for further information to be provided to enable National Highways to fully understand the impact of the development on the safe and efficient operation of the A36 trunk road and thereby provide informed advice to the planning authority.

WC Public Protection: Comment stated below:

- Reviewed comments colleagues made in 2024 regarding this application, and the subsequent response provided by 24 Acoustics in November 2025 addressing the points raised.
- The acoustic consultants confirm that all reasonable measures have been incorporated into the design of the proposed development before reliance on the performance of the building envelope.
- Figure 3 of the report provides noise contour mapping for external areas and demonstrates that every garden will achieve amenity noise levels of 55 dB or below in all, or part, of each garden. A level of 55 dB represents the upper guideline value. It is for the Planning Officer to determine whether, in this case, achieving the upper guideline limit is acceptable given the wider merits of the scheme.
- The proposed scheme relies on the installation of a 3m high acoustic fence with a minimum density of 12 kg/m², together with a 3m high brick wall along the site boundary with the A36. This boundary treatment is essential in mitigating road traffic noise. The Local Planning Authority will therefore need to consider whether this level of boundary treatment is visually acceptable.
- As acceptable internal noise levels cannot be achieved in every room with windows open, mechanical ventilation is required to be installed for some rooms/dwellings. Wiltshire Council does not support reliance on closed windows to meet internal noise criteria, the dominant noise sources comprise indistinct transportation noise.
- The applicant has demonstrated good acoustic design in line with the Planning Consultation Guidance Note on Noise and Vibration and has recommended appropriate mitigation measures.
- This department has no grounds to recommend refusal of the application on noise grounds provided the conditions listed in my colleagues response in 2024 together with the below listed conditions are attached to any approval...

WC Landscape: Referred to previous comment, stated below:

'The principle of developing part of the site has been established through the approval of PL/2021/07611. In terms of landscape and visual effects the site is well contained within the fabric of the city.

I have reviewed the hard & soft landscape plans and the planting schedule and confirm they contain sufficient information to meet the landscaping requirements.'

WC Ecology: Further Information Required, comment summarised below:

Ecology objection due to lack of information that demonstrates that the proposal would be compliant with CP50 and NPPF, and would not result in significant adverse impacts to protected habitats and species. Information required:

- Details of the bat roosts to be lost and those to be retained
- Details of the proposed bat loft on technical drawings including location and access points as well as dimensions
- Assessment of the impacts on dormouse and where required surveys which conform to best practice
- An EPP demonstrating areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping
- A completed River Avon SAC: nutrient neutrality calculator

Urban Design: Objection summarised below:

Objection remains – 14.01.2026

- The proposed development would not meet the high quality of design and place shaping required by Core Policy 57 as it would not adequately draw on the local context & be complimentary to the locality or provide adequate amenity (where identified)
- Plots 13/14/15 - The proposed expanse of hardstanding and run of car parking bays, and removal of hedge/walled boundary and garden frontage would introduce a distinctly urban character into this setting. This would not accord with CP57 iii or CP57 vi - it would not relate effectively to the immediate setting and to the wider character of the area.
- Existing trees following the A36 alongside plot 13 are shown removed. The domestic or acoustic timber fence would be prominent in this street scene and would not maintain the lasting or quality of appearance of the existing brick 'county estate wall'.
- The large side/end of terrace elevation of house 13 is shown blank. This would not accord with CP57 iii (elevational design).
- Tree planting is shown on the revised Landscape plan to this relatively narrow margin contained between plot boundary fence / house façade and A36, this would be insufficient for significant tree canopy and root spread. In this proximity to a major highway, housing is typically set back with a significant depth public open space between.
- The small size of the rear garden of plot 12 would represent a poor level of amenity for a family sized dwelling. This would not accord with CP57 ii (plot size) and vii (amenity). All the other rear gardens appear to be on or only just above this minimum area.
- The Proposed North west Elevation of Plot 10 would be in juxtaposition with the high wall carried forward of the side of plot 1, and the high enclosure up to the bridge would be a not well overlooked and visually a not well defined street and space
- The 'dry canal' is a significant existing strip through the site which appears to be part of the local watercourse, is now proposed to be sandwiched between and bounded by the enclosed rear gardens of the proposed plots on both sides.
- Contained by the proposed rear garden fences this would not be of visual contribution to residents accessible (public) open space. This would not accord with CP 57ii. It would not represent a feature that would be of a maintained quality appearance or enhancement or well-integrated into the development to support quality of place (National Design Guide paragraph 91) and as effectively a shut away area

WC Drainage: Object, for reason stated below:

It is noted that the applicant plans to restrict discharge rates from the site to the greenfield Qbar rate for all events up to the 1in 100year + climate change storm. Wiltshire Council's betterment policy for greenfield sites states:

"With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide 20% betterment over pre-development

(greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6 hour rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards.”

The applicant will be required to resubmit calculations which demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100 year return period storm events. Once this evidence is provided, we recommend the approval of the application with the following conditions:

Housing Enabling: Comment summarised below:

- Comments and observations follow on from previous comments made 15/02/2024.
- Current amended plans are not accompanied by statements which detail their objectives. It is also noted that these amended plans do not acknowledge Affordable Housing in any way, presumably this mirrors the approach taken by previous proposals which have not included the Affordable provision due to viability concerns
- The viability report was not considered acceptable as it had not used a policy compliant Affordable Housing mix and had not been checked and agreed by an independent assessor, among other reasons.
- Wiltshire Council provided comments on the Financial Viability Appraisal provided by the applicant approximately 11 months ago, however, we have not yet received a response to these comment
- Affordable Housing should not automatically be the contribution that is reduced if viability is agreed as it should be a planning decision as to which planning obligation is reduced in order to make the scheme viable
- Core Policy 43 of the Wiltshire Core Strategy sets out a requirement for 40% on-site Affordable Housing provision within the 40% Affordable Housing Zone, on all sites of 10 or more dwellings. There is therefore a requirement to provide 8 Affordable units within a scheme of 20 dwellings.
- Affordable Housing should be secured, at nil subsidy, in a S106 Agreement. In addition to the above it has been previously advised that, should the viability assessment conclude that an Affordable Housing contribution is required, then this should be provided as an on-site contribution and that the location of the Affordable homes should be agreed with the Housing Enabling Team.

WC Open Space: Comment stated below:

‘Using the dwelling mix provided I have calculated the requirement for 20 dwellings to be 304m² of open space and 228m² of equipped play. If this provision is not fully or partially met on site a financial contribution for open space for this size development is £10,600.48 and £32,832.00 equipped play to be provided at a nearby nominated site.

The development also generates a requirement for 1,368m² of sports pitches which equates to an off-site contribution of £13,680. I have contacted the Council’s Leisure Strategy Infrastructure Officer to provide details of the target site for this contribution.

Any on-site Equipped Play would need to be provided as per the Wiltshire Council Play Specification. All on-site POS and Equipped Play needs to be secured and managed in perpetuity. Wiltshire Council will not adopt the on-site POS or Equipped Play.’

Arboricultural Officer: Comment summarised below:

- Proposed tree loss amounts to 50 out of the 96 individual trees identified in the survey. 8 out of 11 groups of trees are to be removed, plus part of 2 others. 6 out of 8 hedgerows are shown to be removed, plus a 3 metre section of 1 other.

- Plot 2 will clip the root protection areas of trees to both the north and west. One of which has been identified as a Sycamore (T96) which has a Preservation Order.
- Proposed dwellings plot 9 & 10 both clip the RPA of T53, which is a very substantial Copper Beech (cat A).
- Several proposed dwellings and infrastructure encroach into the RPA of retained trees. Necessary working space around the perimeter of both will require further intrusion into tree root protection areas.
- This proposal places dwellings and infrastructure close to large trees with significant canopy spreads, resulting in a very poor relationship with dwellings over dominated by the trees.
- Trees dominate the proposed amenity space of plots 1, 2, 6, 9, 10, 11 and 12, where much of the available garden area will be dominated by trees, preventing normal use and enjoyment.
- The proposed access to the parking and turning space in the south east of the site is located almost entirely on top of tree root protection areas and under tree canopy. Detailed plans, including levels will be required to satisfy this concern should the application progress.
- Proposal will result in the loss of too many trees, groups and hedges, and it will not create a development in harmony with the retained trees, likely to lead to future pressure to reduce or fell many more.

Response to revised plans:

'I understand there have been amendments to the scheme which may or may not address my objection dated June 24. In order to assess the implications of the amendments I will require the AIA to be updated.'

Education: Contributions requested as stated below:

PRIMARY SCHOOL PLACES - CONTRIBUTION REQUIREMENTS: Current primary cost multiplier = £18,758 per place. *(Please note that this figure is due to be reviewed and updated for the 2023/24 financial year, and the latest multiplier will then apply to an S106 agreement. So, the contributions stated below are indicative figures only).

- There is a small amount of capacity currently available across the schools in this area and so they can currently accommodate the pupil product of the proposed development, without the need for expansion.
- As a result, we have no requirement for a developer S106 contribution towards expanding places provision in this area of Salisbury, from this application.

SECONDARY SCHOOL PLACES- CONTRIBUTION REQUIREMENTS: Current secondary cost multiplier = £22,940 per place. *(Please note that this figure is due to be reviewed and updated for the 2023/24 financial year, and the latest multiplier will then apply to an S106 agreement. So, the contributions stated below are indicative figures only).

- There is a small amount of capacity currently available across the schools in this area and so they can currently accommodate the pupil product of the proposed development, without the need for expansion.
- As a result, we have no requirement for a developer contribution towards expanding secondary school infrastructure, from this application.

Following submission of amended plans:

'We have considered the amended plans and there is no change to our previous consultation response.'

WC Archaeology: No Objection, subject to conditions

Waste (Refuse & Management): Comment summarised below:

- Waste and recycling containers s106 contribution of £2,055
- 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 roadside
- 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
- If final designs include communal bin stores for flats, guidance is provided. 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. Final designs should demonstrate how these problems are mitigated.

WC Rights of Way: No Comment

Dorset and Wiltshire Fire and Rescue Service: Comment summarised below:

- The development would need to be designed and built to meet current Building Regulations requirements. The Authority raises the profile of these future requirements through this early opportunity and requests the comments made under B5 of Approved Document B, The Building Regulations 2010 be made available to the applicant/planning agent as appropriate.
- Recommendations identified under B5 of Approved Document B relating to The Building Regulations 2010
- Recommendations to improve safety and reduce property loss in the event of fire

Salisbury City Council: Object, for following reasons:

- Support climate team comments
- Archaeological assessment required
- Overdevelopment
- Traffic issues
- Loss of habitat
- Support Swifts Policy
- Should be in line with SCC's Environmental Policy
- Lack of cycle and footpath
- Proximity to water meadows

Comment stated following revised plans:

'SCC Comment in support of Highways extension request to the application.'

Parish Council: Clarendon Park Parish Council objection on the following grounds:

- Highway Safety and Traffic Impact
- Road Condition and Maintenance
- Parking and Emergency Access
- Drainage Concerns
- Construction Traffic Impact
- Outstanding Statutory Consultees' Concerns
- Community Opposition and Previous Consultations

Police Liaison Officer: Comment summarised below:

- Concern regarding the level of permeability across the development
- No holistic view of the boundary treatment to ensure clear demarcation between public and private areas.

- Plots 5, 6, 12 – 15 are most likely suffer from crime and anti-social behaviour - more robust boundary treatment required to protect these homes
- Open area between plots 6 through 9 and 10 through 12 makes these homes vulnerable as there is no effective surveillance from plots 6 – 8 and plots 9 to 12 are bungalows
- Concern regarding terraced homes (plots 13 – 15) and their vulnerability, openness of the rear boundaries adjacent to parking, and sandwiched between two roads.
- The parking for these plots is also vulnerable and more likely to suffer crime as they are directly open to the road with no defensible space to protect them
- The parking for the flats (16, 17, 18, 19) and plots 20 and 21 is much too far from the associated homes, and open to Southampton Road. Vehicles and the people using them are more vulnerable to crime than vehicles parked within view of the associated home.
- The bicycle storage is too far from the assumed users in the flats and is unlikely to be used given that again the owners will have no view of the bikes and they are, by the remoteness of the storage, extremely likely to be stolen.
- Haven't included any reference to safety and security within the D&A as the NPPF states it should. NPPF, NPPG, WCS CP57, all require development to incorporate measures to reduce, or address, any actual or perceived opportunities for crime or antisocial behaviour

REPRESENTATIONS

Below is a summary of the representations received during the consultation period. Only material planning considerations have been taken into account in the assessment of this application. Non-material issues, such as property values or private legal disputes, cannot be considered in the determination process.

11 Objections, 1 No Objection to original submission.

Key Themes in objections to initial submission:

- Highway Safety and Access
 - Petersfinger Road identified as a narrow, unlit, single track lane with no pavements, lighting, or formal passing placed
 - Increased traffic levels leading to conflict between vehicles and pedestrians
 - Existing issues with restricted widths and parked cars, impedes refuse and emergency vehicles
 - Congestion as existing at junction with New Petersfinger Road
- Parking Provision, and Transport
 - Existing on-street parking at capacity
 - Insufficient visitor parking, will overspill onto Petersfinger Road
 - Site is poorly located, reliance on private car use
 - Lack of pedestrian infrastructure, limited provision for cycling or EV charging
 - Conflict with policies CP60 & CP62
- Impact on Residential Amenity
 - Overlooking and loss of privacy – particularly from plots 13-15
 - Increase in noise, disturbance, and general activity, impacting on quiet, rural character of the area
- Drainage and Flood Risk
 - High groundwater levels and adequacy of surface water drainage proposals
 - Lack of clarity regarding foul water drainage infrastructure
 - Proximity to known flooding areas

- Infrastructure and Planning Obligations
 - Absence of affordable housing provision
 - Lack of CIL/financial contributions
 - Conflict with NPPF expectations for early engagement

5 Objections sustained following submission of additional/amended documents

Key Themes in objections received following submission of amended plans and additional information:

- Highway Safety, Traffic Impact, and Unsuitable Access
 - Petersfinger Road is narrow, unlit, no pavements, and unsafe
 - Inadequate width, vehicle passing is difficult, causes obstructions
 - Increased traffic generated by the development – safety risks to pedestrians, cyclists and drivers
 - Emergency vehicle access
 - Existing congestion issues – New Petersfinger Road Junction, Traffic Lights and Tesco access
 - Unsafe turning movements near railway bridge
 - Site entrance and turning areas cause congestion and blockages
 - Holding objection from highways remains unresolved
- Parking and Access Issues
 - Risk of overspill parking obstructing movement
 - Potential for driveways to be used for turning or waiting
 - Existing parking pressures already an issue
- Overdevelopment and Impact on Character
 - Scale of development excessive for the area
 - Harm to existing quiet character of Petersfinger Road
- Construction Impacts
 - Long construction period assumed, resulting in noise, pollution, lorry/heavy vehicle movements
 - Disruption to residents and safety risks during construction
 - Proposed temporary access via Petersfinger Road not tested or justified
 - No evidence that articulated lorries can safely use the route
 - Safety implications for construction vehicles using the road
- Inadequate supporting information
 - Large volume of new documents submitted without explanation or planning statement
 - Lack of clarity on what has changed, whether objections have been addressed
 - Concerns regarding transparency, and meaningful consultation

Salisbury and Wilton Swifts: Request for conditions to be included relating to next boxes, bricks, and swift bricks.

ASSESSMENT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any made Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

EIA Screening

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) require certain types of development to be accompanied by an Environmental Statement (ES) where they are likely to give rise to significant effects on the environment by virtue of their nature, scale or location.

The Local Planning Authority has considered the requirements of the EIA Regulations in determining this application. No formal Screening Opinion was issued prior to submission of the application. The Local Planning Authority has therefore undertaken EIA screening as part of the determination of the application.

Having undertaken screening in accordance with the EIA Regulations, the Local Planning Authority concludes that the proposal does not constitute EIA development because it is not likely to result in significant environmental effects by virtue of its nature, scale or location. This conclusion is reached because:

The proposal comprises an Infrastructure Project, which falls under 10.b, and does not meet the criteria for EIA development. As per Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, section 10(b) states:

(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- (ii) the development includes more than 150 dwellings; or*
- (iii) the overall area of the development exceeds 5 hectares.*

The application is for 21 dwellings and is on an area of land below 5 hectares. As such, it is considered that the proposal does not constitute EIA development.

Principle of Development

Core Policies 1 and 2 of the Wiltshire Core Strategy establish the overarching spatial strategy for Wiltshire and provide the primary Development Plan framework for determining whether development is appropriately located. Together, these policies seek to direct growth towards the most sustainable locations whilst protecting the intrinsic character and beauty of the countryside. The strategy prioritises development within Principal Settlements, Market Towns, Local Service Centres and larger villages, whilst development in the countryside will only be supported where it accords with specific development plan policies or where material considerations indicate otherwise.

The NPPF also contains national policies relating to the location of development. Policies S3-S5 distinguish between development within settlements and development in the countryside,

support sustainable patterns of growth, and require decisions to have regard to the role and function of settlements, accessibility to services and facilities, and other site-specific considerations.

The principle of development should be assessed having regard to the Development Plan as a whole, the NPPF and all other material considerations. The weight afforded to individual policies will depend upon the nature, scale and location of the development proposed.

Where relevant, Policy S6 provides additional protection to qualifying neighbourhood plans. Where a housing proposal conflicts with a neighbourhood plan that became part of the development plan within the last five years and contains allocations to meet its identified housing requirement, the Framework indicates that the benefits of approving development are likely to be substantially outweighed by the adverse effects.

Policy HO7 of the NPPF is also relevant. The policy recognises the importance of delivering homes which contribute towards meeting the evidenced accommodation needs of the community and states that substantial weight should be given to the benefits of providing such homes. The weight to be attributed in any particular case will depend upon the nature of the identified need and the contribution the proposal would make towards meeting that need.

The application site is within the settlement boundary for Salisbury, a Principal Settlement for the purposes of CP1 and CP23. The settlement boundary runs immediately adjacent to the site boundary, as shown on the map below:



Policy S4 of the NPPF states that, within settlements,

'1. Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.

2. In applying policy S4, the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include (but are not restricted to) situations where the development proposal would:

a. Have a substantial adverse impact in relation to:

i. The allocation or safeguarding of land or buildings for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or

ii. The application of the policies in this Framework for existing recreational land and facilities (HC7), Local Green Space (HC8), areas of particular importance for

biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (L2(1)(d)).

b. Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made that does not increase the risk of flooding either on or off-site); or

c. Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.'

CP1, CP23, and the NPPF supports the provision of development within the settlement boundary, or where sites fall within a settlement, unless the benefits of doing so would be substantially outweighed by any adverse effects. The principle of development at this site is supported by policy, however this is subject to the assessment of all relevant material considerations which will be addressed throughout this report.

5 Year Housing Land Supply

The Council's latest Housing Land Supply Statement provides the most up-to-date position regarding the availability of deliverable housing land within Wiltshire and is a material consideration in the determination of planning applications.

The NPPF requires local planning authorities to identify and maintain a supply of specific deliverable housing sites. Housing need, housing requirements, and the supply of deliverable sites are addressed through Policies HO1 to HO6 (for plan-making) and HO7 to HO13 (for decision taking) and Annex D of the NPPF. Annex D sets out the methodology for calculating housing need, assessing land supply, the application of housing land supply buffers using the latest Housing Delivery Test results, and establishing a five-year supply of deliverable housing sites.

The Council's current housing land supply position demonstrates a supply of 2.8 years of deliverable housing land against the relevant housing requirement. This position is a material consideration when assessing proposals for residential development. Where a shortfall exists, this indicates that the Council is unable to demonstrate a full five-year supply of deliverable housing sites and this is capable of attracting significant weight in favour of proposals which would contribute towards meeting identified housing needs. Conversely, where a five-year supply can be demonstrated, this is also a material consideration to be afforded appropriate weight in the overall planning balance.

In determining this application, regard has been had to the Council's current housing land supply position, the relevant housing policies of the development plan, the housing objectives of the NPPF, and all other material considerations. The extent to which the Council's housing land supply position affects the weight to be afforded to housing delivery and other material considerations has been considered as part of the planning balance set out below.

The contribution that this proposal would make towards meeting housing needs, together with any other benefits and harms arising from the development, is assessed within the overall planning balance and conclusion sections of this report.

Consent was granted under 19/00967/OUT, for outline permission for Construction of residential units, which included the construction of 4 new dwellings in land to the rear of

Elmfield House. Reserved Matters, under PL/2021/07611, was granted consent, relating to access, appearance, landscaping, layout and scale. This was determined in June 2022, and has not been implemented.

Design and Impact on the Character and Appearance of the Area

Core Policy 57 of the WCS requires high-quality design that enhances local character, responds to the natural, historic, and built environment, retains important features (e.g., trees, hedges), supports sustainable construction and compatibility with surrounding uses, and creates safe, legible, and accessible spaces.

Policies DP1 to DP4 of the NPPF promote development that is well-designed and visually attractive, responsive to local character and context, functional, accessible and sustainable, supportive of healthy and inclusive communities, resilient to climate change and environmental impacts, and conducive to the creation of high-quality places and a positive built environment.

The Wiltshire Design Guide encourages sensitivity to local character, materials, and architectural styles and supports modern living standards while maintaining aesthetic and functional quality. Building for a Healthy Life NPPF promotes healthy, inclusive, and sustainable places. The document encourages walkability, access to green space, and active design principles for well-being.

In assessing this aspect of the proposal, regard has been had to the site context, the details of the proposed development, the relevant development plan policies, and all other material considerations. The proposed site plan and layout is included below:



The application site includes Elmfield House, and land to the rear, previous used as the paddock associated with the dwelling. The application seems to convert Elmfield House and outbuildings and erect 15 new dwellings. The conversion of Elmfield House would provide 2no. 1-bedroom flats, and 2no. 2-bedroom flats, the conversion and existing of existing outbuildings would provide 2no. 3-bedroom semi-detached dwellings. The new dwellings would comprise 12no. 3-bedroom detached dwellings, and 3no. 4-bedroom detached dwellings. The proposal seeks to implement the dwellings in red brick and tile.

The Urban Design consultee has provided an objection to the revised plans submitted November 2025. They identified the following issued which have not been addressed:

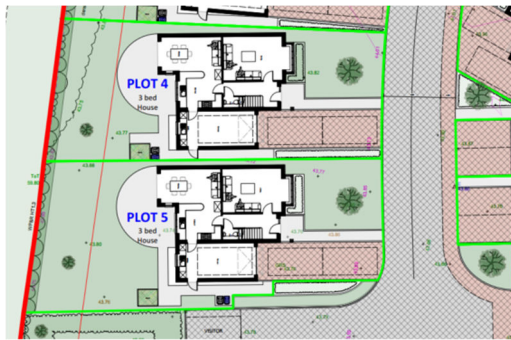
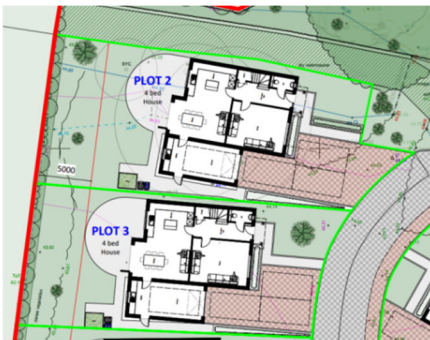
- Plots 13/14/15: (drawing 963.07 C 'Proposed Site Plan and 963.189 Rev C Plots 13/14/15 Plans & Elevations)
- a) The proposed expanse of hardstanding and run of car parking bays over this forward of the houses and removing the hedge/walled boundary and garden frontage to the lane which is a key component of the intrinsic rural character of Petersfinger Road, would introduce a distinctly urban character into this setting, and compounded by the existing garaging and forecourt opposite, a car dominated street scene ... In this case the proposed density of a terrace of three compact town houses and their car parking would not respond positively to the context.
- b) The combined roof span, depth and height of the terrace shown to achieve a significant attic second floor, in proximity to the lane would be of a singular mass that would appear visually awkward (cumbersome) appreciated with the neighbouring properties along the lane, including its relatively uniform form and appearance which also imparts a typically urban estate housing character in juxtaposition with the comparable greater degree of articulation of building form and roofscape of the grouping of Elmfield House/Yew Tree cottage alongside.
- The overall scale (height and mass) of the terrace in proximity would detract from the predominance and stature of this existing Victorian villa in its setting. It is greater than Yew tree cottage which is an appropriately subservient appendage to Elmfield House.
- Point 1 a and 1b - Not satisfactorily addressed . On revised Proposed Site Plan 936.07 Rev J, the proposed semi-detached pair in place of the previously proposed 3 houses in a terrace, would address the above, including the reduced overall scale (height and mass) in juxtaposition to Elmfield House and other neighbouring dwellings, apart from, the loss of characteristic existing mid height walled/hedge backed boundary to the lane, which appears to be shown on Proposed Site Plan and Landscape plan as open plan lawned frontage between and either side of the two proposed driveway access and to the return side of drive to house 13 facing the A36.
- The existing brick site boundary prominent on the approach along the A36 is also a particular characteristic feature notably attractive for its long curved line and capping. This is not identified as being retained on the previous or current revised Plans but replaced by a 1.8m high timber fence to the garage sideway and intermittent planting in the relatively narrow margin revealing the driveway/parked vehicles . Existing trees following the A36 alongside plot 13 are shown removed. The domestic or acoustic timber fence would be prominent in this street scene and would not maintain the lasting or quality of appearance of the existing brick 'county estate wall'.
- The small size of the rear garden of plot 12 would represent a poor level of amenity for a family sized dwelling...rear gardens of 'houses' should ideally be at least equal to the footprint of the dwelling (and of regular shape). This would not accord with CP57 ii (plot size) and vii (amenity). I observe that all the other rear gardens appear to be on or only just above this minimum area.
- No change on current revised Proposed Site Plan 963.07 Rev J. Area still below footprint of dwelling. This would also not meet the WDG expectation 9.2.2 that minimum rear garden area should at least equal footprint of the dwelling and that minimum length of garden should be a minimum of 10m deep.
- The Proposed North west Elevation (side elevation) of Plot 10 by presenting its garage and driveway and high fenced side passageway forward of this at this prominent road corner would present a visually austere face to the close and in juxtaposition with the

high wall carried forward of the side of plot 1 opposite and the high enclosure up to the bridge would be a not well overlooked and visually a not well defined street and space – not addressed, no change on revised Proposed Site Plan 963.07 Rev J.

- The 'dry canal' (drawing 963.07 C 'Proposed Site Plan' and 414 PN 01 Rev B Landscape Plan) This significant existing strip through the site which appears to be part of the local watercourse and is bordered by existing landscape is now proposed to be sandwiched between and bounded by the enclosed rear gardens of the proposed plots on both sides (whereas in previous 19/00967/OUT & PL/2021/07611REM the proposed density and lesser overall number of houses enabled retaining an appreciable landscape down one side of this which would maintain a landscape context and setting for the watercourse).
- Contained by and largely hidden from view by the proposed rear garden fences would leave this strip outside of and not visually contribute to practical residents accessible (public) open space.
- On the current Landscape Plan 414_PN_01 Rev D the fencing containing the watercourse and carried up to the bridge edge on both sides appears to be denoted as 1.2 m high but there appears no drawing of the appearance of the bridge over the watercourse i.e. railings to the bridge? and how this would relate to the proposed fencing carried up to the bridge abutments.
- A 1.8m high fence is still shown down this side forward of house 9 side facade and meets this fencing to the watercourse at a visually awkward point. This high fence would reveal a blank first floor facade above this. This collectively would be a visually poor backdrop in the street scene approach along the road. Is this one access giving directly onto a major highway practical for drawing in/out maintenance equipment /parking up. For security to deter informal access into this not well overlooked and tightly contained high fenced corridor, high secure locked gates would appear advisable across this.

The below maps and plans show the proposed dwellings, with labelled plot numbers, as referenced above:





The site occupies a prominent position adjacent to Southampton Road (A36). The proposed conversion of Elmfield House, outbuildings, and construction of additional dwellings, is considered of significant scale within the site. The nature of development in this area is predominantly detached dwellings set within large plots, located along Petersfinger Road and the A36. The site is set behind the car park associated with the Park and Ride, and to the north west of Southampton Road, with development to the south eastern boundary adjacent to the highway, with Plots 5, 6, and 12 closest to the highway.

The climate consultee provided an objection to the application, noting that the scheme falls below the thresholds in CP41 which requires greater consideration of sustainable construction. This proposal is very different to previous consents on this site, as the number of proposed dwellings is far greater, and the scheme is considered a major development.

As such, a Sustainable Energy Strategy is required. covering issues such as sustainable transport, operational energy, embodied carbon and climate change adaptation. No evidence

has been submitted to suggest that climate change has been a consideration to date, and no SES has been submitted. The Sustainable Energy Strategy should be a fundamental document informing the constraints and opportunities work.

The Arboricultural officer provided an objection to the application, noting that the proposal will result in the loss of too many trees, groups and hedges, and it will not create a development in harmony with the retained trees, which is likely to lead to future pressure to reduce or fell many more.

The archaeological consultee raised concerns, as no documentation had been submitted with this application that provides information on the archaeological impacts of this proposed development. The Planning, Design and Access Statement notes (Para. 5.46) that '*As part of application PL/2021/07611, archaeological investigations were undertaken*', although as I understand it the 2021 application only proposed residential development in the former paddock to the south-west of Elmfield House and separated from its gardens by a small stream or drain. Following submission of further information, the consultee provided a response of no objection, subject to conditions.

The Housing Enabling consultee provided an objection to the application, on the basis that:

- the mix tested in the applicant's viability information would not be acceptable as:
 - It doesn't meet demonstrable need (in accordance with Core Policies 43 and 45 of the Wiltshire Core Strategy) due to the lack of demand for 2 bed rented flats in Wiltshire.
 - It is unlikely that the converted building would be suitable for transfer to a Registered Provider. The Affordable Rented and Shared Ownership units should therefore be provided as new build units.
 - The tenure mix does not include First Homes which would form part of a policy compliant mix.

Comments made by the Housing Enabling Team on 15th February 2024 noted that the viability report which had been provided by the applicant was not considered acceptable as it had not used a policy compliant Affordable Housing mix and had not been checked and agreed by an independent assessor, among other reasons. No further response was provided by the applicant to Wiltshire Council's comments on the Financial Viability Appraisal.

It is considered that the proposed scheme would have unacceptable impact, which is not suitably mitigated, on the appearance of context and wider area, does not present an acceptable scheme in terms of design, layout, massing and scale, nor does it reflect the character of residential development in the area. The proposal would give rise to potential detrimental impacts on existing trees, and provides no strategy to address sustainability and climate change. The application is therefore contrary to CP1, CP2, CP41, CP51, and CP57.

Amenity

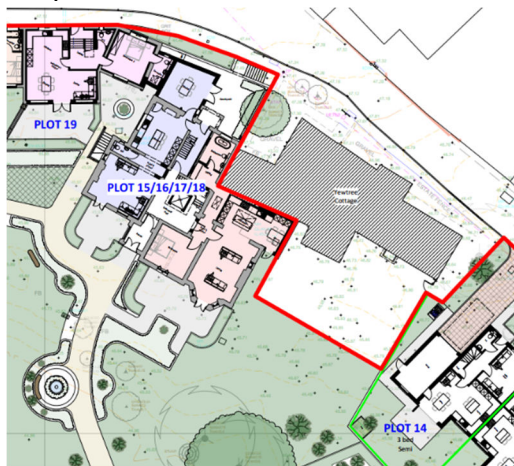
Core Policy 57 (Point vii) of the Wiltshire Core Strategy requires development to respect the amenity of existing occupants and ensure appropriate amenity levels for future residents.

Policy P3 of the NPPF requires development to be appropriate for its location, taking account of its likely effects on health, living conditions and the environment. In particular, Policy

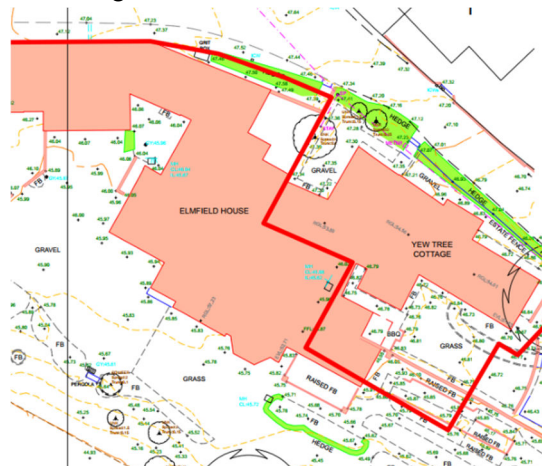
P3(2)(b) requires development to avoid giving rise to unacceptable impacts on the living conditions of neighbouring residents and occupiers. In assessing amenity impacts, regard should be had to matters including daylight and sunlight, outlook, privacy, overbearing impacts and other effects on residential amenity. These policies guide the assessment of amenity impacts.

The application site is bordered by the car park associated with the Park and Ride to the west and north west, by the highway to the south and north, and residential dwelling Yew Tree Cottage to the north east. Yew Tree Cottage and Elmfield House are a pair of semi-detached dwellings that front the site along Petersfinger Road. The proposed site plan appears to show removal of a building within the curtilage of Yew Tree Cottage, which cannot be included in this application, as it falls outside the red line boundary. This area is shown on the below plans:

Proposed Site Plan



Existing Site Plan



In terms of residential amenity for future occupiers, it is not considered that the proposed layout provides suitable private amenity space, particularly for plots 9, 10, 11, and 12. The rear gardens are constrained in size and would not reflect the provisions of the Wiltshire Design Guide. The parking provision for plots 15-20 is accessed via the internal highway across the frontages of plot 10, 11, and 12. This is not considered a suitable arrangement as it would result in increased traffic movements adjacent to the front elevations of these chalet bungalow dwellings.

The proposed semi-detached dwellings at plot 14 and 15, adjacent to Yew Tree Cottage, are in close proximity to the rear garden of the existing cottage. Side elevation windows are proposed, to the staircase of plot 14, which would be in view of the rear garden of Yew Tree Cottage. This window does not serve a habitable window, however would provide unobscured views into the private rear garden.

The Police liaison officer has provided comments on the application, raising concerns for the following, which would be of impact on residential amenity:

- The plots along the south of the development (5, 6, 12 – 15) are most likely suffer from crime and anti-social behaviour and I would like to see more robust boundary treatment to protect these homes.

- The open area between plots 6 through 9 and 10 through 12 makes these homes vulnerable as there is no effective surveillance from plots 6 – 8 and plots 9 to 12 are bungalows. Landscaping within this area is likely to provide hiding places for offenders.
- I am concerned about the three terraced homes (13 – 15) and their vulnerability given the openness of the rear boundaries adjacent to the parking and sandwiched between two roads, Petersfinger Road and Southampton road, which will give legitimacy to non-residents being in the immediate area to the rear of the properties, yet they do not benefit from any surveillance from the surrounding homes. The parking for these plots is also vulnerable and more likely to suffer crime as they are directly open to the road with no defensible space to protect them.
- The parking for the flats (16, 17, 18, 19) and plots 20 and 21 is much too far from the associated homes and it appears to be open to Southampton Road. This makes the vehicles and the people using them more vulnerable to crime than vehicles parked within view of the associated home. Similarly, the bicycle storage is too far from the assumed users in the flats and is unlikely to be used given that again the owners will have no view of the bikes and they are, by the remoteness of the storage, extremely likely to be stolen.

It is considered that the proposed layout does not comply with Core Policy 57 (Point vii) of the Wiltshire Core Strategy, or Policy P3 of the NPPF, which requires development to be appropriate for its location, taking account of its likely effects on health, living conditions and the environment, and requires development to respect the amenity of existing occupants and ensure appropriate amenity levels for future residents. Policy P3(2)(b) requires development to avoid giving rise to unacceptable impacts on the living conditions of neighbouring residents and occupiers, which has not been achieved in the proposed development.

Highways Impacts and Parking

The NPPF transport policies (TR3-8) seek to ensure that development is supported by a safe, sustainable and efficient transport system. Development proposals should provide appropriate access arrangements, promote sustainable modes of travel, support active travel and public transport use, minimise impacts on the transport network, and ensure that any residual impacts on highway safety or network capacity are appropriately mitigated.

Transport implications are a key factor in assessing planning applications, particularly for major development proposals. Proposals should demonstrate:

- Safe and suitable access for all users, including pedestrians, cyclists, public transport users and those with mobility impairments.
- That any transport impacts have been appropriately assessed and mitigated.
- Promotion of sustainable travel choices, reducing reliance upon private vehicles where possible.
- Adequate vehicle and cycle parking provision in accordance with adopted standards.
- Protection and enhancement of public rights of way, walking, wheeling and cycling connections.
- Integration with existing and planned transport infrastructure.

Relevant policies include Core Policies 60–64 of the Wiltshire Core Strategy, supported by the Wiltshire Local Transport Plan, Car Parking Strategy, and Cycling Strategy. The Local

Cycling and Walking Infrastructure Plan (LCWIP) and LTN 1/20 (DfT) provide further design guidance for active travel infrastructure. Proposals must also ensure safe access for refuse collection vehicles and comply with the Wiltshire Council Waste Storage and Collection SPD (2017).

Where necessary, Transport Assessments or Statements should be submitted to evaluate impacts and identify mitigation. Planning conditions or legal agreements may be used to secure off-site improvements, travel plans, or contributions to sustainable transport infrastructure.

The highways consultee has provided an objection, following submission of revised plans, raising concerns regarding the following matters:

- No new footway has been proposed along Petersfinger Road, towards the junction with New Petersfinger Road, as requested. This is still considered a fundamental highway safety issue with this proposal, that will attract an adverse Highway recommendation if it is not satisfactorily resolved.
- I still do not believe that the rear communal car parking area for the converted units is ideal, given the distance from the building, however, the numbers do meet policy requirements
- I note that a 'Site Setup Plan' has been submitted, which is welcomed. A construction access is proposed from the A36T and I note that National Highways are seeking additional details in respect to this. A 'Phase 2' access has also been proposed from the end of Petersfinger Road, however, I do not believe this is realistic given the width of the road at this point.
- I seek revised plans showing the provision of a new footway from the site access to the junction with New Petersfinger Road, prior to making a formal Highway recommendation. If revisions are not forthcoming, I can provide refusal reasons on request.'

National Highways have raised concerns regarding the following:

- National Highways has reviewed the updated documents provided but considers that further information is still required to enable us to fully understand the impact of the development on the safe and efficient operation of the A36 trunk road. In particular, further details should be provided in relation to:
- a preliminary design for the proposed pedestrian/cycle access onto the A36, its means of connection with the existing footway and its suitability for shared use;
- the proposed surface water drainage and foul sewage arrangements, their impact on the existing National Highways culvert structure and National Highways means of access for maintenance purposes.

National Highways recommends that Wiltshire Council does not grant planning permission in respect of planning application reference PL/2023/10495 for a period of up to 6 months from the date of this recommendation. This is to allow time for further information to be provided to enable National Highways to fully understand the impact of the development on the safe and efficient operation of the A36 trunk road and thereby provide informed advice to the planning authority.

The application was registered in December 2023. Since then, several opportunities have been given for the applicant to submit revised plans, additional information, and further detail

in relation to the outstanding matters. The applicant has not been able to address the outstanding highways issues, outlined above, in any of the revised submissions, and is not longer seeking to provide additional information. As such, it is considered that the application is contrary to NPPF transport policies (TR3-8) and Wiltshire Core Strategy, Core Policies 57, 60 and 61.

Ecology and Biodiversity

Core Policy 50 of the WCS Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. Policy N2 of the NPPF seeks to ensure that development contributes positively to the natural environment and supports nature's recovery. Development proposals should conserve and enhance biodiversity, minimise adverse impacts on habitats and species, strengthen ecological networks where appropriate, and identify opportunities for biodiversity enhancement.

Proposals must assess and address potential effects on protected species, priority habitats; ecological networks; and green and blue infrastructure.

Biodiversity Net Gain (BNG) is an approach to development seeking to ensure that habitats for wildlife are left in a measurably better state than they were before the development. As of 12 February 2024 (2 April 2024 for smaller sites) BNG is mandatory in England under the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This means developers must deliver a BNG of 10% to ensure development will result in more or better quality natural habitat than there was before development.

The Wiltshire Green & Blue Infrastructure Strategy (2022–2030) encourages habitat connectivity, nature based solutions, and integration of biodiversity within site design; these principles guide the assessment of detailed proposals.

Where Policy S5 is engaged due to an identified unmet housing need, the benefits associated with housing delivery must be weighed in the planning balance. However, Policy N2 of the NPPF states that where significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or compensated for, the development should be refused. In addition, development that would adversely affect the integrity of a Habitats Site would be contrary to the requirements of the Conservation of Habitats and Species Regulations 2017 unless the relevant statutory tests are met.

In assessing this aspect of the proposal, regard has been had to the site context, the details of the proposed development, the relevant development plan policies, and all other material considerations.

The ecology consultee has provided a response of objection, with further information required. The below outstanding matters have not been addressed:

- The amount of functional habitat for biodiversity would be greatly reduced compared to the current habitat features within the site. This does not align with the requirements of WCA, Hab Regs, CP50, NERC or NPPF.
- Improved Landscape Plans which demonstrate that the existing boundary vegetation (including the habitat alongside the ditch) and the functionality of the ditch are suitably

retained and the proposed trees are appropriately spaced to account for future root and canopy growth.

- A suitable mitigation strategy for the loss of priority habitat and pond.
- Amended proposed building elevation drawings to include all integrated ecology features.
- Clarification on which trees had low bat roost suitability.
- Clarification on why internal access to Building 1 (Elmfield house) was not granted.
- Further survey and mitigation might be required subject to the result of this information request.
- Clarification is required if the Barn is a confirmed bat roost.
- Clarification supported by evidence on why it was considered the site has low connectivity for hazel dormice.
- Justification supported by evidence on why further surveys were not completed to determine the site's importance for otters.
- Confirmation on the location of the reptile translocation receptor site
- A completed nutrient budget and mitigation strategy must be submitted to favourable conclude the AA
- Payments for the SAMM contribution in relation to New Forest Internationally Protected Sites

Habitats Regulations Assessment (HRA)

Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) requires the Local Planning Authority, as the competent authority, to consider whether a plan or project is likely to have a significant effect on a Habitats Site, either alone or in combination with other plans or projects. Where likely significant effects cannot be ruled out, an Appropriate Assessment must be undertaken.

The proposed development has been assessed, having regard to its location, scale and nature, and its potential to affect designated Habitats Sites, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and Ramsar sites.

Where likely significant effects cannot be ruled out, an Appropriate Assessment has been undertaken. This assessment considers the implications of the proposal for the conservation objectives of the relevant Habitats Sites, including the effectiveness and certainty of any mitigation measures proposed.

Although an Appropriate Assessment is required, insufficient information has been provided with this application to reach a conclusion that there would be no adverse impacts, or that any adverse impacts could be suitably mitigated. The Local Planning Authority is not satisfied that the proposal would avoid an adverse effect on the integrity of a Habitats Site, either alone or in combination with other plans or projects. In the absence of effective and certain mitigation, the proposal fails to satisfy the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). Accordingly, planning permission cannot be granted.

Flood Risk and Drainage

Core Policy 67 of the WCS outlines that all new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

Sustainable Drainage Systems (SuDS) are required for all major developments and must manage runoff near its source, improve water quality, support biodiversity and amenity, and be integrated into the site layout and green infrastructure.

The NPPF requires flood risk to be taken into account at all stages of the planning process and seeks to direct development away from areas at highest risk of flooding. Policies F4, F5 and F6 require flood risk to be assessed through site-specific Flood Risk Assessments where necessary, the application of the Sequential Test where applicable, and the Exception Test in those circumstances identified by national policy.

Where appropriate, applications should be supported by a site-specific Flood Risk Assessment. Development should only be supported where it can be demonstrated that it will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere and, where possible, reducing flood risk overall.

Development should demonstrate that within the site, the most vulnerable development is located in areas of lowest flood risk where practicable; the development is appropriately flood resistant and resilient; sustainable drainage systems are incorporated where appropriate; any residual flood risk can be safely managed; and safe access and escape routes are provided where necessary.

Where Policy S5 is engaged due to an identified unmet housing need, the benefits associated with housing delivery should be weighed alongside all other material considerations. However, the existence of housing need does not negate the requirement to assess proposals against the flood risk policies of the NPPF.

The drainage consultee has maintained their objection to the application, following submission of revised plans. They noted that the revised submission does not address the key drainage requirements outlined in the original consultation response. In particular, evidence of 20% betterment in surface water discharge rates and volumes, detailed attenuation design drawings, exceedance flow routing, flotation calculations, and a construction-phase vegetation and drainage management plan remain outstanding

Surface water will discharge to the existing dry watercourse, as infiltration is not feasible due to shallow groundwater, with post-development flows restricted to QBAR rates (1.45 l/s for Catchment 1 and 0.82 l/s for Catchment 2) and attenuation provided through permeable paving sub-bases, attenuation crates beneath parking and turning areas, and impermeable membranes to prevent groundwater ingress.

It is noted that the applicant plans to restrict discharge rates from the site to the greenfield Qbar rate for all events up to the 1 in 100 year + climate change storm. Wiltshire Council's betterment policy for greenfield sites states:

"With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide 20% betterment over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6 hour

rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards.”

The applicant will be required to resubmit calculations which demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100 year return period storm events.

As the applicant is not pursuing a further submission of additional information, the drainage consultees concerns have not been addressed, and the objection is maintained.

PLANNING BALANCE AND CONCLUSION

Policy S4 of the NPPF states that, within settlements,

‘1. Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.

The provision of dwellings is a significant benefit, where the Local Planning Authority has an unmet need. However, policy states that this should only be approved where the benefits of doing so would be substantially outweighed by any adverse effects. The assessment of this application has identified significant adverse effects, with harms identified including visual impact, residential amenity, highways safety, ecological impact, archaeological impact, harm to trees, and drainage. These are considered to substantially outweigh the benefits of the proposal when assessed against the NPPF as a whole. Having regard to the Development Plan, the NPPF and all other material considerations, the proposal is considered to fail to satisfy the requirements of Policy S4, where the application fails to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances. Accordingly, planning permission is recommended for refusal.

RECOMMENDATION:

That Planning Permission be REFUSED, for the following reasons:

1. Highways

Petersfinger Road is a narrow, no-through road, which lacks any pedestrian facilities along a key section of the route and the increase in traffic generated by the development will increase the risk to pedestrians walking within the carriageway and thus, be to the detriment to highway safety in the area. The development will also likely increase pedestrian trips towards the key facilities towards the North along Petersfinger Road, further increasing the risk of conflict between vehicles and pedestrians.

Insufficient information has been provided to fully assess the impact of the development on the safe and efficient operation of the A36 trunk road, with a lack of information provided relating to:

- a preliminary design for the proposed pedestrian/cycle access onto the A36, its means of connection with the existing footway and its suitability for shared use;
- the proposed surface water drainage and foul sewage arrangements, their impact on the existing National Highways culvert structure and National Highways means of access for maintenance purposes.

This proposal is therefore contrary to NPPF transport policies TR3 and TR4 and Wiltshire Core Strategy, Core Policies 57, 60 and 61.

2. Drainage

The proposal fails to demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100 year return

period storm events, and is therefore contrary to NPPF policies F4-8, and Wiltshire Core Strategy CP67 which requires that all new development must address flood risk from all sources and not increase flood risk elsewhere, supports the use of Sustainable Drainage Systems (SuDS), and requires that developments demonstrate how surface water will be managed sustainably.

3. Trees

The application fails to provide sufficient arboricultural information to demonstrate that the trees on the site would be adequately protected during the construction and operational phases of the development. The proposed access to the parking and turning space in the south east of the site is located almost entirely on top of tree root protection areas and under tree canopy, and ground protection is proposed to prevent compaction of the ground, shown as being laid close to the base of the trees. The proposal will result in the loss of too many trees, groups and hedges, and Local Planning Authority cannot be satisfied that the proposed development would avoid unacceptable harm to trees. The proposal therefore conflicts with CP50 and CP57 of the Wiltshire Core Strategy (2015), which requires development to protect, conserve, and enhance Wiltshire's natural environment, including important landscape features such as trees.

4. Ecology

The application does not provide sufficient information to demonstrate that the proposal would not result in significant adverse impacts to protected habitats and species or be compliant with WCS CP50 and the NPPF. The submission does not include the necessary information, to include:

- Details of the bat roosts to be lost and those to be retained
- Details of the proposed bat loft on technical drawings including location and access points as well as dimensions
- Assessment of the impacts on dormouse and where required surveys which conform to best practice
- An EPP demonstrating areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping
- A completed River Avon SAC: nutrient neutrality calculator

The Local Planning Authority, as competent authority, must therefore take a precautionary approach, and it is considered that based on the submitted information, the proposal could have a significant effect on habitat and protected species, contrary to the aims of policy CP50 of the Wiltshire Core Strategy and similar guidance in the NPPF 2024 (including the provisions of paragraph 11d footnote 7), and the associated PPG and the Habitat Regulations.

5. Amenity

The layout of dwellings, associated amenity space, and parking provision, is not considered acceptable, and would not reflect a high standard of amenity for future occupiers. As proposed, the development would be contrary to the provisions of CP57 of the Wiltshire Core Strategy, the adopted Wiltshire Design Guide, and relevant policies of the NPPF. It is considered that the proposed layout does not comply with Core Policy 57 (Point vii) of the Wiltshire Core Strategy, which requires development to be appropriate for its location, taking account of its likely effects on health, living conditions and the environment, and requires development to ensure appropriate amenity levels for future residents. It is also contrary to Policy P3(2)(b), and L2(1)(d.iii) of the NPPF, which requires development to avoid giving rise to unacceptable impacts on the living conditions of neighbouring residents and occupiers, and maintain acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space, which has not been achieved in the proposed development.

6. Design

The site is located in a prominent position along the A36 highway, where important and well-established landscaping and features define the area. The proposed design, layout, and boundary treatments would introduce an urban appearance in an area of rural character. It is proposed that all established trees and existing brick wall adjacent to the highway is removed, and replaced with domestic fencing, which is not considered to maintain the quality of appearance in this location. Within the site, landscaping, boundary treatments, layouts, and overall design of the proposed development would not reflect high quality design, nor would it make a positive contribution to the character of the area. The layout is considered to give rise to opportunities for crime or antisocial behaviour, and does not include the provision of renewable energy sources, contrary to CP57, and CP41 of the WCS. Parking arrangements, layouts, and amenity space are not provided in line with the objectives of CP57 of the Wiltshire Core Strategy, the Wiltshire Design Guide, or the NPPF. The affordable housing mix is not acceptable as it does not meet demonstrable need, in accordance with Core Policies 43 and 45 of the Wiltshire Core Strategy.