



## Salisbury Consultation Response Form

Ref:

(For official use only)

A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

**Please return to Wiltshire Council, by 5pm on Monday 8<sup>th</sup> March 2021.**

**By post to:** Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

**By e-mail to:** [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk)

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

### Section One – Personal details

\*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title	Councillor	

First name	John	
Last name	Farquhar	
Job title (where relevant)	Chair, Planning Committee	
Organisation (where relevant)	Salisbury City Council	
Address Line 1	Guildhall	
Address Line 2	Salisbury	
Address Line 3		
Address Line 4		
Postcode	SP1 1JH	
Telephone Number	07490 493972	
Email Address	jfarquhar@salisburycitycouncil.gov.uk	

## Section Two – Questions

### SB1. What do you think to the scale of growth? Should there be a brownfield target?

*Should this figure be higher or lower?*

#### Answer:

Overall, the Salisbury Neighbourhood Development Plan (SNDP) Steering Group (SG) supports the recognition that expanding the city outwards is becoming increasingly difficult. However, the manner in which growth is expressed is unhelpful and does not comply with the requirements of the NPPF 2019 as explained below.

The LPR sets out the following requirements/targets for Salisbury:

1. Brownfield target: 410 dwellings (to 2031)
2. Residual requirement of 940 dwellings (to 2036)

3. Success in brownfield delivery in this plan period may lead to fewer greenfield allocations in future LPRs.

In addition, the Emerging Spatial Strategy states that:

*“The brownfield targets set out in the Local Plan will be the basis for housing requirements for designated neighbourhood areas at main settlements. Once adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”*

NPPF 2019 sets out how neighbourhood plans should approach the matter of meeting local housing requirements (emphasis added):

*“65. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. **Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.** Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.*

*66. **Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body.** This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”*

The SNDP SG requested on more than one occasion for a housing requirement figure to be supplied by the LPA. Officers indicated that this would not be possible since the figures were being finalised for the LPR and that in the meantime, the SNDP should make best endeavours to find land and that this figure would be sufficient for planning purposes. The SNDP SG had anticipated that a figure would be provided in the LPR. This has not been done, and the result, set out below, is confusing for a number of reasons:

1. The approach of using brownfield targets, which are acknowledged as not necessarily being achievable (and therefore not deliverable) is contrary to the requirements of paragraphs 65, 66 and 67 of the NPPF. “Brownfield targets” cannot be equated with “housing requirement figures”.
2. The brownfield targets and requirements are on different timescales (the former ending on 2031 and the latter on 2036). This is unhelpful and makes it difficult for the SNDP to work to its intended plan period of 2036.
3. The term “brownfield” is being conflated with the term “windfall” and both are treated separately from “greenfield”. Though “brown” and “green” sites are mutually exclusive, “brownfield” and “windfall” are not - it is possible for unplanned development to occur on greenfield sites in Salisbury City. The LPR brownfield target is based on past planning permissions and is not disputed, but the conflation of the two terms (brownfield and windfall) is not helpful to neighbourhood planners. For the purposes of neighbourhood planning, “windfall” would be more helpful.
4. Overall, the figures are aggregated to include surrounding parishes. It is not clear which parishes are included in the discussions about “Salisbury”, what the individual parish requirements are, or how each individual NDP is expected to respond. Each parish in the Salisbury urban area should be given clear housing requirement figures and these should be broken down as: overall housing requirement and percentage/number expected from windfall, which will include brownfield development”.
5. The LPR approach to have a housing requirement and an additional brownfield target will inevitably lead to an oversupply of housing. As is acknowledged, the SNDP SG has undertaken a call for sites and is considering a number of large brownfield sites, many of

which are hoped to yield significant numbers of housing. The current approach would include this delivery against greenfield sites in the NEXT review of the local plan, but not in this one. However, if the SNDP can allocate deliverable sites in the current plan period, this should be taken into account in the current LPR plan period, not the next one.

6. As is recognised in the LPR, the development of brownfield sites is more problematic and presents higher development risks than housing delivered on greenfield sites. The SNDP will be seeking to focus on releasing brownfield sites that have heretofore been difficult to progress through the normal application process and which would benefit from specific policy consideration. It would therefore be beneficial to phase greenfield development to come onstream only where brownfield development has progressed or proven to be impossible. This will be necessary in order to create a more level playing field in terms of market availability and managing development risk. Brownfield redevelopment should be promoted in early phases of the SNDP and LRP plan periods, and the release of greenfield land should be delayed to come onstream at later periods to equalise their relative market advantages.

7. Therefore, for proposed Site 6 (which lies partly within the Salisbury Neighbourhood Area, the SNDP SG requests that this site is reserved for later stages of the Plan Period, and that it cannot be released as an available site until it has been proven that the brownfield sites have not come forward or have been developed. Site 6 should be a reserve site.

7. —

SG has had difficulty in obtaining windfall development figures from the LPA. It would be very helpful for future monitoring reports to provide specific details for the parish of Salisbury. It would also be helpful for these figures to be disaggregated to include change of use so that the recent changes in the Use Class Order and permitted development could be assessed to understand the relative availability of commercial uses (primarily E and B Classes and sui generis) *vis a vis* Use Class C3.

**SB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

**Answer:**

**Place shaping priorities**

Overall, it is very disappointing that the priorities make no mention of the Salisbury Vision which is on the SNDP website:

[https://www.salisburycitycouncil.gov.uk/images/pdf/salisbury-neighbourhood-plan/DOC73437\\_NDP\\_Draft\\_Vision.pdf](https://www.salisburycitycouncil.gov.uk/images/pdf/salisbury-neighbourhood-plan/DOC73437_NDP_Draft_Vision.pdf)

The Salisbury Vision should be reflected in these place shaping priorities.

**i. Delivering opportunity sites, including The Maltings and the Railway Station, to ensure long-term city centre resilience**

The SNDP SG considers this to be a skewed first priority which overemphasises the work done by Wiltshire Council and does not provide scope for SNDP opportunity sites.

The SNDP SG are concerned that the Maltings scheme is subject to significant delays that jeopardise its delivery. This is a very important scheme, and integrally related to the River Park Project, and its success is key to Salisbury's future prosperity.

It is recommended that this priority be amended as follows:

1. Sole emphasis on achieving success at the Maltings site and the River Park Project, as a *key regeneration project in the City;*

2. Inclusion of the Railway Station in priority ii (Central Area Framework) since this is likely to proceed as planned and does not require to be the first priority.
3. Acknowledge that the SNDP may also identify opportunities.

#### **ii. Realising Salisbury Central Area Framework measures to maximise the visitor economy and secure the place as a cultural destination**

This priority should be rewritten to include the Railway Station in the CAF, since the former is part of the latter and they both focus on the visitor experience.

In addition, though the importance of the CAF and its objectives is acknowledged, there other measures beyond “visitor economy” and “culture” that should be promoted through new development. This priority should also include matters such as sustainable development that leads to a reduced carbon output, general economic improvement (not just tourism), a thriving City Centre, improved green and blue infrastructure, better sustainable transport options that lead to improved air quality and better health outcomes, and affordable housing for young people.

The current wording is too limited and will not provide a suitably rounded framework for the SNDP.

#### **iii. Conserving the landscape setting of Salisbury, notably in terms of the city skyline and views to / from the cathedral and Old Sarum**

This is a good start but too brief to describe the complexity of Salisbury’s character. This principle should address the richness of the landscape, the importance of Salisbury’s unique historic heritage and its historic fabric.

#### **iv. Maintaining separation and distinctiveness between Salisbury and Wilton, and between Salisbury and adjacent settlements, notably Ford, Laverstock, Britford, Netherhampton and Quidhampton**

This is unclear and should be redrafted. This should be about supporting local distinctiveness not separation which is not a helpful term.

Salisbury and Laverstock and Ford are already adjoined. Site 1 in Laverstock is seen as within Salisbury according to the assessment, where it is considered a sustainable location, but for the purposes of this priority, it is separate.

Britford is subject of greenfield allocations, notably with sites 6 and 7, that will bring the Salisbury settlement into its boundary, though in this review, there remain some green buffers. There appears to be a logical conflict here that should be clarified.

The recent allocation and permissions in Netherhampton, and the planned boundary changes will bring a part of Netherhampton into Salisbury parish.

It is recommended that in addition to this priority, a clear set of settlement boundaries for all parishes is created, and that there is a separate LP policy, which sets out clear intentions for green buffers between the settlements. It may be necessary to consider a Green Belt around Salisbury in the next review. In addition, Green and Blue Infrastructure can add structural corridors of separation between settlements.

Overall, SNDP SG supports the use of green buffers and policies that will protect the distinctiveness of neighbouring settlements.

#### **v. Expanding affordable housing provision, notably for education and healthcare personnel**

There appears to be no justification why housing provision for “education and healthcare personnel” is required in particular. The SNDP SG suspects that this is in support of the HEAT project at Salisbury Hospital. As such, the SG does not object to this priority, and it is apparently being met in Britford in any event, but its justification should be more transparent.

More importantly, there are other key workers on lower incomes, who find the Salisbury housing market challenging – the priority should be aimed at “key workers” and not only education and healthcare personnel.

The infrastructure requirements in the settlement profile for Salisbury are clearly pointing to a need for affordable housing for young people and the elderly. The Salisbury Housing Needs Assessment

(HNA), prepared by AECOM in support of the SNDP, also shows that these two groups require special consideration in terms of the sort of affordable housing provided. This evidence should be reflected in this priority.

The SNDP SG has evidence that workers from Porton Down would wish to live in Salisbury, but cannot because of housing affordability. Affordable housing in Salisbury can therefore add to the economic competitiveness of Porton Down and DSTL.

The priority does not make clear what types of affordable housing are required in Salisbury Parish and the Salisbury SNDP HNA will be used to prepare a detailed housing mix policy. It would be helpful for the priority to acknowledge this.

**vi. Identifying suitable locations in the area to facilitate around 5ha of business growth that responds to needs**

There are no economic land allocations and it is unclear how or where this priority will be delivered. There are only vague statements about Churchfields which, as will be discussed below, the SG has serious concerns about. The economic land review pre-dates Covid and should probably be revisited and brought in line with current trends.

Although the SNDP SG welcomes sustainable transport access improvements to the Churchfields area, it is strongly opposed to the principle of focusing economic development there and making it an "attractive location to a greater diversity of businesses."

The SNDP SG and Salisbury City Council have given detailed reasons in the past why it is inappropriate to have large scale commercial activities in Churchfields. These arguments will not be repeated here and will be progressed separately with officers and in policies in the SNDP. However, to reiterate and summarise, commercial activities in Churchfields result in unacceptable high levels of car and lorry traffic in Salisbury's Conservation Area, adding significantly to poor air quality in the AQMA and creating severance to walkers and cyclists, many of whom are tourists, in the central area. Therefore, increasing economic activity in Churchfields will inevitably make these harmful impacts worse.

This policy is a dramatic and unacceptable departure from Core Policy 20, which seeks to reduce the amount of commercial activity in Churchfields. There has been no compelling evidence put forward in the LPR why this change in policy is sought or justified.

The CAF public consultation report specifically reveals the comments made about Churchfields. The responses clearly support the current Core Policy 20 approach and do not encourage growth in businesses (and therefore of car traffic). However, the officer response arrives at an entirely different conclusion. The SNDP will strongly challenge this change in approach.

The proposed policy for Churchfields is a major departure that will lead to greater traffic in the AQMA and will therefore give rise to significant negative environmental effects. However, the Interim SEA does not consider this policy change. This will also be strongly challenged by the SNDP SG.

The LPR is an opportunity for Wiltshire Council to review its waste policies, and to update the Waste Core Strategy, which is now over 12 years old and predates the NPPF. This was brought to the attention of senior officers. Many Unitary Authorities now incorporate waste and minerals policies in their local plans, and there is no reason (other than inertia) why this cannot be done in Wiltshire. Though there may be complications due to joint working with Swindon, this should not be an excuse to ignore this important planning matter.

The Interim Sustainability Appraisal did not consider the options around commercial activities in Churchfields and this is an error and unacceptable omission. Without a full consideration of alternatives, it is inappropriate to create this new priority for Salisbury, given the significant environmental impacts that have been brought to the attention of the LPA concerning Churchfields.

Wiltshire Council is a significant land owner in Churchfields and yet, as far as the SNDP Steering Group are aware, none of its land has been redeveloped in line with its Core Policy 20. The Council is therefore not heeding its own policies. This shows another lack of joined-up thinking and the appalling lack of attention to detail that leads to severe environmental impacts. For instance, had WC redeveloped its Churchfields land holdings in accordance with Core Policy 20, there would have been a drop in HGV traffic through the historic core and the AQMA, with a concomitant increase in housing within walking distance of the town centre and the Railway Station.

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The SNDP will seek to address these shortcomings and will argue strongly that there should be a reduction, and not an increase, in commercial activity in Churchfields. The SNDP will argue that efforts to introduce new housing in Churchfields, which is within walking and cycling distance of the railway station and the City Centre, should be promoted and that current commercial and local government activities should be encouraged to relocate to more sustainable locations.

#### **viii. Facilitating the regeneration of the District Hospital site to underpin its key role in the community and as a University-level skills provider for Salisbury**

These sites are outside the Salisbury City Boundary, and though the SNDP SG supports the regeneration and growth of the hospital, it has no specific comments to make, other than to note its connection to the city by light rail would bring marked benefits for both.

#### **ix. Providing infrastructure to improve air quality, flood resilience and connectivity**

This appears to be a catch-all statement that has not been properly considered and the inter-relationships have been ignored, for instance with regard to land use in Churchfields and its impact on other parts of the City. The relocation of "infrastructure" which the household waste centre, HGV weigh station and depot undoubtedly are, would also be beneficial for the reasons referred to above. In addition, there is other infrastructure, such as green and blue infrastructure, walking and cycling infrastructure, schools, healthcare facilities, etc, in addition to what is listed, which will also be required. Overall, this priority needs refinement and to be based on a more thorough assessment of infrastructure requirements.

#### **Other matters**

The SNDP SG considers that the manner in which the priorities were established was unhelpful. Though Salisbury is a Principal Settlement and therefore of strategic importance, and officers were aware that the SNDP was in preparation and regular officer liaison meetings have taken place for over a year and a half, at no time was the SG actively consulted regarding these priorities. The SG was only given sight of an early draft of them. The current draft is clearly a top down set of priorities that seeks to progress WC objectives, but is not concerned with locally identified priorities.

The planning white paper encourages planning authorities to use more effective consultation techniques. These LPR priorities provide a case in point: there was local knowledge in the SNDP SG and its evidence and there was an engaged City Council, but officers nonetheless prepared priorities based only on WC objectives.

It would have been more satisfactory and productive had officers been more transparent and collaborative, when these priorities were produced. For instance, it might have been helpful to agree the priorities in a workshop between WC officers, the SNDP SG and the City Council. It would also have been helpful if the priorities made note of the SNDP community survey which showed clear community priorities. This was shared with officers, as were the results of the HNA, but it would appear that no account of this important evidence was taken.

The SNDP has identified significant omissions to the priorities and requests that these be included in later drafts.

1. Although Climate Change will be an overarching theme for the LPR, the SG feels that this should also feature prominently in the Salisbury priorities.
2. The delivery of multi-functional green infrastructure, which combines deliverability of climate change resilience, sustainable transport infrastructure and improved accessibility and connectivity, biodiversity improvements, both land based and riparian, should feature as a priority. This will be an important theme in the SNDP and it would be helpful to have a LP priority that facilitated this. It would also support local distinctiveness as GBI could provide the backdrop for distinct and individual settlements in Salisbury's hinterland.
3. There is no recognition that the retail sector in the CAF is facing severe challenges from the 2018 attack, changing shopping habits, Covid 19 lockdown and the failure of many retailers as a result, and the changes to the use class order and proposed expansion of permitted development rights, which may lead to a significant change in stock and land uses in the CAF area. Retaining a vibrant City centre that meets the needs of the population, surrounding settlements and visitors should be a priority. This is more than just delivering the CAF. It may also have an impact on how housing on windfall sites is delivered. Article 4 directions may be required in the City centre.
4. There is no mention of design, though Salisbury has very high quality urban design and design is receiving renewed attention from Government in the White Paper and proposed changes to the NPPF.
5. The historic fabric of Salisbury is both a benefit and impediment. The many historic buildings in the City add positively to its character, but at the same time are inflexible in the face of new requirements to meet climate change. This conflict should be recognised.
6. There is very little consideration of health and wellbeing in the priorities, though the regeneration of Salisbury Hospital is mentioned and this is welcomed. More thought needs to be given to how health and wellbeing needs will be met and the overall health and wellbeing of the population will be improved. This could be delivered through better access to enhanced nature, improved infrastructure for active travel, and improved community cohesion.
7. Further consideration is also needed for primary care settings, including dental and mental health facilities, as well as general medical.

Overall, the SNDP SG feels that the way that the priorities were prepared has led to some serious omissions and misplaced emphasis. It invites Wiltshire Officers to work collaboratively to refine the priorities so that they are fit for both Local and Neighbourhood Planning purposes.

It would be helpful if the LPA, the SNDP SG and City Council could agree two sets of interrelated and mutually supportive priorities (Strategic and Local) that could be delivered through both plans in a parallel process. A workshop for this purpose would be beneficial.

Alternative wording for the priorities will not be provided, so that final wording can be collaboratively agreed.

On a related matter, the SG has been watching the progress of the Better Places Board, where it was hoped that matters such as Churchfields and sustainable transport linked with GBI would be considered. To date, these important matters have not been addressed and the SG is concerned that the Board is not the forum to progress these complex land use matters.

### **SB3. Do you agree these sites are the most appropriate upon which to build?**

*If not, why not?*

**Answer:**

#### **Site 1**

The Salisbury Site Allocation Report states with regard to this site:

*“This parcel of land is north-west of The Portway. Development here would enlarge the new district of Old Sarum which, owing to the separation of the airfield, feels distinct from northern Salisbury. Old Sarum is nonetheless well-connected to main services and amenities, notably as a result of its Park and Ride facility.”*

The SNDP SG wishes to point out that this site is not “well-connected to the main services and amenities” of Salisbury and that, in reality, this allocation will result in increased car journeys into Salisbury.

This is therefore considered to be an unsustainable location for development, unless services can be delivered within walking and cycling distance of the proposed allocation.

#### **Site 6**

This site was proposed for the SNDP Call for Sites (July 2020) and has been progressed to the stage where the SG will discuss its potential for development with the proposers. This may lead to an allocation in the SNDP.

If the site is allocated, it will be necessary for the SNDP SG to work closely with Wiltshire officers to conceive of fully considered policy responses to this site.

Also, if allocated, the SNDP may seek to delay the development of Site 6 to a later phase of the plan so that brownfield allocations can be progressed. This will be necessary in order to create a more level playing field in terms of market availability and managing development risk. Brownfield redevelopment should be promoted in early phases of the SNDP and LPR plan periods, and the release of greenfield land should be delayed to come onstream at later periods to equalise their relative market advantages.

#### **SB4. What are the most important aspects to consider if these sites are going to be built on?**

Answer:

The SNDP will consider Site 6 as a potential site allocation. It will seek to work closely with the site proposers and Wiltshire Council officers in doing so.

This question cannot be answered until these discussions have concluded and a draft SNDP approach has been prepared.

More specifically, the following matters are called to the LPA’s attention:

- The term “specialist provision” is not clear – what does this mean?
- What is the justification for a GP surgery and school? What part of the site (inside or outside Salisbury) would be the location?
- What is “custom-build” and how is this different from “self-build”?
- Is site 6 considered to be part of the Salisbury hospital expansion or is it required to meet the housing requirement?
- How will walkers from Site 6 cross over to the Park and Ride safely?
- These sites are considerably distant from the City Centre – should there not also be provision for a small shop and community building? There is a lack of community facilities in Harnham generally.

**For the identified preferred development sites at principal settlements, concept plans have been developed. Concept plans for each area show a way the land identified can be developed. They show the undeveloped land, areas suggested for development and possible locations for uses within them.**

**Please state which concept plan your answer is in relation to.**

*If your comments relate to both sites, please make it clear in each answer to which site your comments relate*

The SNDP will consider Site 6 as a potential site allocation. It will seek to work closely with the site proposers and Wiltshire Council officers in doing so.

This question cannot be answered until these discussions have concluded and a draft SNDP approach has been prepared.

**SB5. How can these concept plans be improved?**

The Concept Plan for Site 1 shows: '*Future Salisbury Amesbury cycleway to pass along the Portway*'. The extension of this route to Amesbury is not shown in Fig 3-3 of the Local Transport Plan Review, and it is unclear how this relates to the existing Salisbury to Amesbury link (NCN Route 45 via the Woodford Valley), or the route via the Winterbournes which is shown on Wiltshire Council's route map to Stonehenge. (map available from: <https://www.connectingwiltshire.co.uk/getting-around/cycling/cycle-maps-routes/rural-cycling/>)

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This question cannot be answered until these discussions have concluded and a draft SNDP approach has been prepared.

**SB7. Do you agree with the location of the proposed uses? What should be located where and why?**

The SNDP will consider Site 6 as a potential site allocation. It will seek to work closely with the site proposers and Wiltshire Council officers in doing so.

This question cannot be answered until these discussions have concluded and a draft SNDP approach has been prepared.

**SB8. Do you agree with the proposed locations for self-build and custom-build housing? Would you prefer alternative locations?**

*If so, please explain*

These do not appear to be included in Site 6, though perhaps they should be.

**SB9. Is there any other issues or infrastructure requirements that should be identified?**

**Answer:**

**Parking**

Both the CAF and the online consultation on 26 January 2021 mentioned car parking in Salisbury. Both referred to the possibility of releasing a city centre car park for housing development. The SNDP is looking closely at this and will explore how a car park might be redeveloped as a site allocation.

In order to release a car park for redevelopment, the CAF sets out a requirement for a car parking study to determine whether this is a realistic and viable option. The CAF is a year old and there has been no mention of a parking study, except by Sam Fox indicating that a Salisbury car parking study was part of the LPR process, during the 26 Jan 21 online event.

The SNDP considers that the parking information required for a study is already available: the car parks are run by WC and there is data on the number of parking tickets sold. Therefore, a parking study could be done using pre-Covid data that would give an accurate representation of parking demand once lock-down restrictions are lifted.

**The SNDP SG requests that the parking study is done as a matter of urgency and that the results are shared (even if only in draft form) so that the SNDP can proceed with a housing allocation on an existing car park.**

## Green Infrastructure

The SNDP SG is surprised that there was nothing in the Salisbury Settlement Profile Transport section (or elsewhere in the profile) about comprehensive improvements to walking and cycling infrastructure, which need to be closely linked and integrated with Green/Blue Infrastructure (GBI) aspirations for the city and local area.

The GBI section of the profile refers to corridors, but this appears to relate only to biodiversity and heritage assets. Well-designed multifunctional GBI which includes linear routes for walking and cycling, both within and beyond an urban area, should be included in the profile.

## Interim Sustainability Appraisal Non-Technical Summary

Site 1 has been given the best score of any of the sites for transport – this seems illogical, given the distance from the City Centre. It is stated also that: *“this site is poorly connected to the city centre”* (p.59 of the Interim Sustainability Appraisal Report), although there are some public transport links close to the site. If houses are supplied with the 2 x car parking spaces, as such houses are generally allocated, then this site is likely to generate a considerable amount of additional traffic on this road corridor.

## Formulating Alternative Development Strategies

Assumptions Para 19

The SNDP SG seeks clarification on what the barriers to Churchfields redevelopment are – while land ownership across the site presents a barrier, there are parcels of land which are already owned by Wiltshire Council – e.g. Household Waste Recycling Centre, HGV weigh station and Council depot, the police custody suite and the Engine Shed site. Not only have these sites not been put forward for the SNDP’s Call for Sites, they do not feature as alternatives for the SEA nor in the site assessment methodology. Does Salisbury require greenfield allocations because the WC property department is not responding to the WC town planning teams?

**If you have any further comments you wish to make, please detail them below.**

### **Imrey’s Quarry (Quidhampton Quarry)**

Core Policy 20 currently identifies this site for 4 ha of employment use. The SNDP is seeking to allocate this land as housing and is in discussion with the land owners regarding the deliverability of this. Should the site be allocated, it would be helpful if the LPR were aligned so that the site would be identified as a potential residential area, or had the economic development expectation removed.

## Local Transport Plan Review

The LPR fails to take adequate account of the step-change in transport and its relationship to land use planning, which is now underway. The recent report from the RTPi 'Net Zero Transport: The role of spatial planning and place-based solutions. <https://www.rtpi.org.uk/netzerotransport> makes the point (para 1.1) that: "transport is the largest contributor to the UK's greenhouse gas (GHG) emissions, and that while emissions from other sectors have fallen dramatically since 1990, those from transport have reduced by under 3%. In an average local authority, transport is responsible for 35.5% of all emissions, with the sector remaining 98% reliant on fossil fuels." The 'Climate Change' report submitted as part of the Local Plan Review makes the point that in Wiltshire transport is responsible for some 40% of all emissions.

Despite the imperative of giving consideration to transport solutions, which will contribute to the 2030 net zero carbon target, the Transport Review has failed to focus the contribution which transport issues make to the problem, or could make to the solution.

It is suggested in section 4.4 of the Transport Review that one of the 'Next Steps' should be: "*More explicit consideration of the carbon reduction agenda, including adoption of an 'Avoid-Shift-Improve' approach to reducing the need to travel, shifting to zero carbon modes and accelerating the uptake of electric vehicles*". This needs consideration at an early stage of strategic planning, as does consideration of a light rail network, and before drafting of a Transport Review, not afterwards.

Turning to some specific comments:

### Walking and cycling measures (3.2)

Should this make reference to detailed work which is presumably being undertaken for the Local Cycling and Walking Infrastructure Plan? (LCWIP) by the SNDP Connectivity Focus Group?

Walking and cycling includes access to an improved network of countryside and urban Public Rights of Way. A strategy was set out in Wiltshire Countryside Access Improvement Plan 2015–2025 Rights of Way Improvement Plan, but now, without explanation, appears to have disappeared from the evidence. The SNDP considers this report to be relevant and worthy of implementation. It should be included as evidence in the LPR.

It is unclear how the 'new walking and infrastructure' shown in Figure 3-3 relates to the 'eleven sections of new cycle infrastructure' mentioned in the text, and whether the £10.46 million mentioned in Appendix G Estimated Scheme Costs will cover all of these schemes. There are a number of queries around the cycle infrastructure shown on Figure 3-3:

- The Sustrans NCN cycle routes, which go from Wilton through Salisbury to Alderbury (NCN route 24) and the route from Salisbury Cathedral north via the Woodford Valley (NCN 45), have always been considered important links. Parts of these routes (e.g. out to Alderbury and Wilton) are still missing, why are these not prioritised and shown on Fig 3-3?
- The River Park Project for Salisbury offers opportunities for improving sub-standard parts of NCN 45. This should be shown on Fig 3-3.

- Some of the roads, where on-carriageway cycle lanes are shown, do not appear to be wide enough to accommodate such lanes, particularly if they are built to LTN 1/20 standards – e.g. Wilton Road, Devizes Road, South Western Road, Milford Mill Road.
- In some cases, on-carriageway cycle lanes or segregated cycle tracks are marked in Fig 3-3 where previous cycle network plans (see Salisbury and Wilton Town Cycle map on <https://www.wiltshire.gov.uk/transport-town-cycle-networks>) have shown ‘quiet streets’, which would not typically need such lanes (e.g. Heronswood, Bedwin Street/Bourne Hill, Estcourt Road).

### **Rail Strategy (3.3.2)**

Access to existing stations is important, but the Transport Review should also give consideration to further rail improvements, such as those put forward in the SWLEP Rail Strategy Report (see SWLEP Rail Strategy Main Report on <https://swlep.co.uk/about/our-strategies>)

In addition to service improvements (some of which would provide benefit to Salisbury) the SWLEP Rail Strategy included recommendations for new stations in Wiltshire included Corsham, Devizes Parkway, Porton & Wilton (the latter being subject to results of a study on Porton). These last two would be particularly relevant to Salisbury and would help to encourage a modal shift to public transport locally.

Provision of a light rail network around Salisbury could revolutionise modal shift away from motor vehicles and towards sustainable, non-polluting, active transport.

### **Bus Strategy (3.3.3/3.3.4)**

This section should be expanded to include reference to Salisbury, in particular how routes can be extended/improved to serve the expanding settlement. It would be appropriate to refer to changes in the role which Park & Ride sites, and associated bus services, might be able to make to contribute to modal shift.

Furthermore, there needs to be a section to cover ‘**Shared Transport**’ or ‘**Mobility as a Service**’ (**MaaS**).

When responding to questionnaire sent to local authorities, who are members of the Western Gateway Sub-national Transport Body, Wiltshire Council’s response to the question: “*How much are you thinking about Future Mobility e.g. Mobility as a Service (MaaS), connected vehicles, active travel measures within your local area?*” included the statement that: “*Wiltshire’s priorities are currently set out to maximise economic growth in those large towns where it can be accommodated more sustainably and where MaaS, Active Travel and commercial frequent public transport can be supported.*” (see December 2020 Agenda and Supporting Papers at <https://westerngatewaystb.org.uk/about/board-meetings-and-minutes/>).

Given the statement that MaaS can be supported in large towns, it would be appropriate to include a section to cover such possibilities. In the case of Salisbury, this might include reference to how the existing Car Club (Co-Cars) could be expanded and also to other potential projects such as e-bike hire.

### **C2 Car parking recommendations**

As mentioned previously in this appendix, there is a need to review car park usage within Salisbury. The Salisbury Central Area Framework proposed the redevelopment of Brown St and Salt Lane car parks be explored, but the first step should be a review of current parking usage

across the City, so that car parking in the City Centre can be consolidated. The redevelopment of brownfield sites, such as car parks, should be prioritised over green field allocations, therefore a review of car park usage is of some importance.

### Wiltshire Retail and Town Centres Study 2020

Agree there is no need for further major retail, but would like to see convenience stores spread across the wider settlement, to help reduce the need to travel.

### Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES:  NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

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Signature:

Date:

Thank you for completing this form.

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