

## 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	Ms	
First name	Annie	

Last name	Child	
Job title (where relevant)	City Clerk	
Organisation (where relevant)	Salisbury City Council	
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## 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 City Council (SCC) who is also responding on behalf of the Salisbury Neighbourhood Development Plan Steering Group (SNDP 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 a housing requirement figure to be supplied by the LPA on more than one occasion. 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 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. This is now important because there is no longer a secure 5 year housing land supply. 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 and is also a term recognised as being part of housing land supply calculations in the NPPF.
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: (a) overall housing requirement, (b) percentage/number expected from windfall, which will include brownfield development, (c) brownfield allocations”.
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 houses. 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 LPR plan periods, and the release of greenfield land should be delayed to come onstream at later periods to equalise their relative market advantages.
7. It is unclear how brownfield/windfall development will be monitored. Historically, the SNDP 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**

SCC 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.

SCC 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 are 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 to 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, SCC 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. SCC suspects that this is in support of the HEAT project at Salisbury Hospital. As such, SCC does not object to this priority, and it is apparently being met in Britford in any event, but its justification should be more transparent and the wording more inclusive of other groups in need.

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, SCC has serious concerns about. The economic land review pre-dates Covid 19 and should probably be revisited and brought in line with current trends.

There has not been a recognition that post-Covid 19, many local businesses will have failed (especially in the CAF area). These projections (which appear to be based on pre-Covid 19 data) should be adjusted to account for vacated business spaces.

#### **vii. Improving Churchfields such that it integrates better within the city, particularly for non-vehicular access, and presents a more accessible and attractive location to a greater diversity of businesses**

Although SCC 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.”

SCC and the SNDP SG 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 first 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 in the consultation report arrives at an entirely different conclusion from the responses. There has been no justification why the officer response does not reflect the clearly opposite meaning of the responders. The SNDP will strongly challenge this change in approach.

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. More importantly, the proposed policy change for Churchfields is a major departure from current policy that will lead to greater traffic in the AQMA and will therefore give rise to significant negative environmental effects. The lack of consideration in the interim SEA of Churchfields generally and the proposed changes to Core Policy 20 specifically will be strongly challenged by SCC in the Local Plan Inquiry.

Most concerning, despite the strong and frequent requests by the City Council for clarification on the removal of the household waste recycling centre, the depot and the weigh station, and other WC landholdings, there has been no advancement of this in the LPR. Ideally, Wiltshire Council should relocate its commercial activities (including those delivered by third parties) to sites outside Churchfields that have a lower environmental impact.

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 on many occasions, including the Chief Executive. 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.

Wiltshire Council is a significant land owner in Churchfields and yet, as far as the SNDP Steering Group and SCC are aware, none of its land has been redeveloped in line with its Core Policy 20. Wiltshire Council has 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.

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 SCC supports the regeneration and growth of the hospital, it has no specific comments to make.

#### **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 recycling 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**

SCC 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 for a year and a half that a neighbourhood plan was in preparation, at no time was SCC actively consulted regarding these priorities. SCC was only given sight of an early draft to comment upon. 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 SCC and the SNDP SG, but officers nonetheless prepared priorities based only on WC objectives.

It would have been more satisfactory and productive had WC 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 WC officers, as were the results of the HNA, but it would appear that no account of this important evidence was taken.

SCC 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, SCC 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 environment 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 constraint. 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 challenges. 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 SCC 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 with SCC to refine the priorities so that they are fit for both Local and Neighbourhood Planning purposes.

It would be helpful if the LPA and SCC 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, SCC 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 SCC 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 6**

Site 6 is the only site allocation in the Salisbury City boundary and NDP area. It straddles the boundary with Britford Parish.

SCC have met with Britford Parish representatives to discuss Sites 6 and 7 and have come to similar conclusions regarding the appropriateness of these proposed allocations. Both Councils feel that the implications of the sites should be considered together.

SCC considers the development on Site 6 to be unacceptable for a number of reasons:

1. The addition of 220 houses and associated traffic will have an unacceptable impact upon the Harnham Gyratory which already suffers extreme congestion and is arguably not fit for purpose. The existing congestion will be exacerbated as permitted development in Netherhampton comes on line, generating its own traffic. The gyratory will be improved but SCC is extremely concerned that this will not be sufficient to cope with permitted development let alone additional traffic arising from development at sites 6 and 7.
2. The case that Site 6 is capable of sustainable transport links to the City Centre is overstated. The A338 is a busy road and will not be an attractive cycle route. There is an existing cycle path but this may become congested if an additional 220 dwellings are built. The proximity of the Park and Ride for site 6 is misleading: the A338 is an effective barrier between Site 6 and the Park and Ride and it is unlikely that most residents at Site 6 would actually use the Park and Ride.
3. The SNDP SEA Interim Report has flagged significant environmental effects for this proposed site allocation across a wide range of environmental indicators:

*Biodiversity and Geodiversity: The site is adjacent to the East Harnham Meadows SSSI and the River Avon Systems SSSI. Additionally, the River Avon SAC is approximately 250m to the north of the site. In this respect, the whole of the site is within SSSI IRZs for the types and quantum of development likely to come forward at this location. BAP Priority Habitats overlapping with these European and nationally designated sites include areas of lowland meadows and coastal and floodplain grazing marsh. Whilst there are no BAP Priority Habitats within the site itself, there are trees and hedgerows located along the site boundaries which contribute to local ecological networks. These features would need to be retained and enhanced (where possible) through new development areas.*

Climate Change: Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the city and an intensification of uses at this location. The site is located at distance to the services and facilities in the city centre (c.2.2km walk or cycle to Salisbury Market Place). In this respect, an allocation at this location is perhaps less likely to reduce the need to travel by car for accessing day-to-day services and facilities (and associated greenhouse gas emissions). With reference to flood risk issues, the site is within Flood Zone 1 and mostly has a very low surface water flood risk. However, there is a significant area of land immediately to the north of the site within Flood Zone 3, which encompasses the network of ditches and drains surrounding the River Avon. There is a small area of land within the northern section of the site which has a high surface water flood risk. As the site slopes down to the north, an allocation at this location has the potential to exacerbate flood risk concerns within the surrounding area.

Landscape: The site is not within or within proximity to a National Park, AONB or any Green Belt land. Although the site is adjacent to the built up area of the city, an allocation at this location would result in the loss of greenfield land and reduce the 'green gap' between Salisbury and the neighbouring village of Britford (with associated impacts on landscape character). Reflecting the results of the Salisbury District Landscape Character Assessment (LCA) (2008), the site is within Character Area A4 'Lower Avon Narrow Chalk River Valley'. The townscape and landscape role and function description within the LCA indicates that the site is within a location which supports the character of the historic cores and areas distinctive to the settlement, bolstering the sense of place. In terms of visual impacts, the site also affords views of Salisbury Cathedral from some locations. With reference to locally important landscape features, the site does not contain any significant trees with TPO designations. However, TPO designations S/TPO19 and S/TPO1 are located directly to the north and to the south of the site (respectively).

Historic Environment: The northern site boundary is within the Salisbury Conservation Area, with the conservation area covering approximately 10% of the site. The site slopes down to the river (which is within the conservation area); as such development on the site has the potential to impact on the setting of the conservation area to the north.

Three Grade II listed buildings are located approximately 175m to the east of the site at Bridge Farm. These are 'Bridge Farmhouse', 'Barn about 30 metres south west of Bridge Farmhouse' and 'Barn about 20 metres south of Bridge Farmhouse'. These features have some visibility from the site, although a degree of screening is provided from hedgerows and trees. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site, and no further features listed on Wiltshire HER are present on or adjacent to the site."

Land, Soil and Water Resources: A detailed agricultural land classification assessment has been completed for the site. In this respect, the central and northern sections of the site are underlain by Grade 2 land, which is some of the best and most versatile (BMV) land for agricultural purposes. An allocation at these locations would result in the permanent loss of BMV agricultural land. Comparatively, the southern section of the site is underlain by Grade 3b land which is not BMV land. In terms of the water environment, there are no watercourses passing through or

*adjacent to the site boundaries. The nearest watercourse to the site (the River Avon) is located approximately 250m to the north. The whole of the site overlaps with the South Wessex Groundwater NVZ. Wiltshire and Swindon's Minerals and Waste Policies Map highlights that the site overlaps with a Minerals Resource Zone. In this respect, an allocation at this location could potentially impact the integrity of mineral resources within the SNDP area.*

4. The landscape impacts identified in the SNDP interim SEA noted above have also been identified by Britford Parish Council who are very concerned that the allocation will result in the loss of a valuable green gap between settlements and unacceptably impact upon the identity of Britford as separate settlement. This goes counter to the LPR's own stated strategic priority "iv. Maintaining separation and distinctiveness between Salisbury and Wilton, and between Salisbury and adjacent settlements, notably Ford, Laverstock, Britford, Netherhampton and Quidhampton." SCC strongly opposes the removal of this green gap between settlements.

### **Site 7**

Site 7 is outside the City boundary and therefore not for SCC to comment upon other than to stress that the traffic impacts on the Harnham Gyratory stated for Site 6 above will also apply to this site.

Site 7 is on an elevated position and should it be developed for housing, will increase water run off onto Site 6. For this reason, it is important to consider the inter-relationship between the two sites.

### **Sites 6 and 7 together**

Should Site 7 be developed, and Site 6 be retained as a green gap, it would be possible to produce innovative sustainable development policies that would address multiple climate change issues such as water run-off into the SSSI arising from the developed area and additional tree planting for carbon capture. The SNDP will explore how to use Site 6 as a country park which can be developed as the sustainability and biodiversity offset of impacts from Site 7.

### **The contribution of 220 houses from Site 6**

The removal of Site 6 from the LP will result in a notional deficit of 220 houses. However, if the LPR makes the requested adjustments to the approach to windfall and brownfield development, and considers allocations in the SNDP as making a contribution to meeting the overall housing land requirement, then the 220 homes should easily be accommodated within Salisbury, making the most effective use of land.

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

Answer:

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*

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

See SB3 for comments on Site 6.

**SB6. Do you agree with the range of uses proposed? Which other uses should be considered?**

See SB3 for comments on Site 6.

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

See SB3 for comments on Site 6.

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

*If so, please explain*

See SB3 for comments on Site 6.

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

**Answer:**

**Local Transport Plan Review and Salisbury Transport Strategy**

Both Wiltshire Council's Local Plan and the 2018 Salisbury Transport Strategy refresh correctly identify that new housing development will increase pressure on Salisbury's road network - particularly the A36 and arterial routes. While some modest and seasonal modal shift to cycling, walking and public transport will occur and is very welcome, the inescapable reality remains that more houses will lead to more cars on Salisbury's road network.

Given this backdrop, SCC strongly urges that Wiltshire Council updates the Salisbury Transport Strategy and works in conjunction with Highways England to develop proposals to reduce the amount of through traffic in Salisbury - particularly on the A36. Although the A36 is being examined as part of a broader strategic study with the A350 in the government's Road Investment Strategy 2 (RIS2), there is a need for greater recognition of Salisbury's specific transport problems and articulation that a specific solution for the city is required. Increased investment in junction improvements is welcome, but unlikely in and of itself to resolve congestion on key routes.

Salisbury City Council therefore requests that Wiltshire Council considers safeguarding potential route corridors for a bypass or outer relief road to ensure that sites for housing development do not overlap with realistic future routes to resolve Salisbury's congestion problems.

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 and before drafting of a Transport Review, not afterwards.

In addition, Covid 19 has led to changes in working patterns and it is likely that in future, more people will be working from home. It is also likely that there will be an economic downturn, particularly in the retail centre of Salisbury, and this should also be reflected in a review.

## **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.

SCC 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.

SCC 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**

SCC 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.

## **Formulating Alternative Development Strategies**

### **Assumptions, Para 19**

SCC 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.

**Turning to some specific comments:**

### **Walking and cycling measures (3.2)**

Walking and cycling measures should take account of work being done in the LCWIP for Salisbury.

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. SCC 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.

### **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**

SCC agrees that 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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Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Thank you for completing this form.

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