

Basic Conditions Statement

Salisbury Neighbourhood

Development Plan 2020 – 2038

Introduction

1. This Statement has been prepared by Salisbury City Council (the City Council) to accompany its submission to the local planning authority, Wiltshire Council (WC), of the Salisbury Neighbourhood Development Plan 2020-2038 (the Neighbourhood Plan) under Regulation 15 of The Neighbourhood Planning (General) Regulations 2012.
2. The Neighbourhood Plan must meet the following requirements:

Legal matters

(1) The examiner must consider the following: -

- (a) whether the draft neighbourhood development plan meets the basic conditions (see sub-paragraph (2)),
- (b) whether the draft neighbourhood development plan complies with the provision made by or under sections 61E(2), 61J and 61L,
- (c) whether the area for any referendum should extend beyond the neighbourhood area to which the draft neighbourhood development plan relates, and
- (d) such other matters as may be prescribed.

The Basic Conditions

(2) A draft neighbourhood development plan meets the basic conditions if: -

- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan,
- (b) the making of the neighbourhood development plan contributes to the achievement of sustainable development,
- (c) the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- (d) the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations, and
- (e) prescribed conditions are met in relation to the neighbourhood development plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan.

(f) The examiner is not to consider any matter that does not fall within subparagraph (1) (apart from considering whether the draft neighbourhood development plan is compatible with the Convention rights).

Legal Requirements

3. The Plan is submitted by Salisbury City Council, which, as a qualifying body, is entitled to submit a Neighbourhood Plan for its own parish. The Plan has been prepared by Salisbury Neighbourhood Plan Steering Group, which is overseen by the Town Council.
4. The whole parish of Salisbury City has been formally designated as a Neighbourhood Area under the Neighbourhood Planning Regulations 2012 and was formally approved by Wiltshire Council on 18 July 2019. The decision and the approved neighbourhood area map are attached in **Appendix 1**. Following boundary changes, a new neighbourhood area boundary was designated in January 2022, which is shown in **Appendix 2**.
5. The Plan contains policies relating to the development and use of land within the neighbourhood area. Proposals relating to planning matters (the use and development of land) have been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012.
6. The Plan identifies the period to which it relates as 2020 to 2038. The end date of 2038 aligns with that of the emerging Wiltshire Local Plan review.
7. The Plan does not deal with County Matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.
8. The Plan relates only to Salisbury City parish though it makes reference to land outside the parish boundary. It does not relate to more than one neighbourhood area. There are no other neighbourhood development plans in place within the neighbourhood area.

The Basic Conditions

Contributes to the achievement of sustainable development

The SNDP seeks to progress sustainable development, as defined in the National Planning Policy Framework (2023), directing and shaping new development to meet economic, social and environmental objectives. The impact of the policies on sustainable development are set out below.

	Economic objective	Social objective	Environmental objective
1: Tree planting for carbon capture			
2: Air quality			
3: Carbon neutral development			
4: Electric vehicle charge points			
5: Design in the built environment			
6: The Close and its Liberty			
7: The Chequers			
8: Protecting views of Salisbury Cathedral spire			
9: Enhancing blue and green Infrastructure			
10: Safeguarding and enhancing green and blue infrastructure			
11: Biodiversity net gain			
12: Habitat improvement and restoration schemes			
13: Open space			
14: Local green space			
15: Construction and development management for projects affecting the River Avon SAC			
16: Housing mix and affordable housing			
17: Churchfields and the Engine Shed site			
18: Healthcare facilities			

- 19: Community infrastructure
- 20: Allotments
- 21: Provision for play and sport
- 22: Sustainable transport
- 23: Cycling and walking Infrastructure
- 24: Cycle parking
- 25: Cycling for pleasure
- 26: Residential parking
- 27: Working from home and live-work units
- 28: Visitor accommodation
- 29: Post Offices
- 30: Major food retail



Having regard to national policies and advice contained in guidance issued by the Secretary of State

The National Planning Policy Framework 2023 was the basis of all policies in the plan. **Appendix 3** discusses how the policies in the plan are in accordance with these policies for each of the neighbourhood plan policies.

General conformity with the strategic policies in the development plan

9. The Development Plan for the neighbourhood plan is:

- Wiltshire Housing Site Allocations Plan February 2020
- Wiltshire Core Strategy 2015
- Saved policies from the Salisbury District Local Plan 2011
- Wiltshire Waste Site Allocations Plan 2013
- Wiltshire and Swindon Aggregate Minerals Site Allocation Plan 2013
- Wiltshire Minerals Core Strategy 2009
- Wiltshire Minerals Development Control Policies 2009
- Wiltshire Waste Core Strategy 2009
- Wiltshire Waste Development Control Policies 2009

10. The Wiltshire Local Plan is currently under review. Wiltshire Council have produced a significant amount of supporting evidence and emerging policy positions which are referred to in the neighbourhood plan as appropriate. The plan was prepared before the Regulation 19 consultation on the Wiltshire Local Plan was issued.
11. In July 2023, immediately before the SNDP was finalised for submission, WC issued a Pre-submission Draft 2020-2038 Local Plan for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The SNDP has been prepared under the Wiltshire Core Strategy 2015 and it is the City Council's intention to review the SNDP once the Wiltshire Local Plan is adopted. This Basic Conditions Statement will not therefore compare the SNDP against the emerging Local Plan. However, where new evidence has been provided, for instance regarding Salisbury's Housing Requirement, or an emerging policy indicates a departure from the Core Strategy, these matters will be considered here. The emerging local plan is discussed in more detail in **Appendix 4**.
12. Salisbury City Council submitted objections to the Regulation 19 draft Wiltshire Local Plan. The main issue for the objection is that the LPA failed to follow the requirements of the Strategic Environmental Impact Assessment requirements set out by government ([Strategic Environmental Assessments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/strategic-environmental-assessments)). The SEA that accompanies the Regulation 19 consultation draft failed to consider the potential contribution that brownfield sites could make to meet Salisbury's provision for housing. As a result, the local plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary. The full concerns, which affect the City Council's view of the Regulation 19 local plan proposals are set out in an Argument that was submitted to Wiltshire Council in November 2023. This is copied in **Appendix 5** and is relevant to the policy justification for the Salisbury NDP.
13. National planning policy limits neighbourhood plans to "non-strategic" policies⁴. Strategic policies should set out an overall strategy for pattern, scale and design quality of places and make provision for housing, employment, retail, infrastructure and policies on conservation and enhancement of the built and natural environment⁵. Local Plans should make explicit which policies are strategic policies and these should be limited to those necessary to address the strategic priorities of the area to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans⁶.
14. The Wiltshire Core Strategy does not make explicit which policies are strategic or local. It states that the Core Strategy provides a solid framework which neighbourhood plans can use to decide how best to plan locally⁷. The Core strategy contains a number of policies that are more appropriately dealt with through a neighbourhood plan, and are now dealt with in the neighbourhood plan.
15. The neighbourhood plan does not contain any policies relating to minerals and waste planning.
16. Development Plan policies are discussed in **Appendix 3** which explains how the policies in the Development Plan are in accordance with each of the neighbourhood plan policies.

17. The Core Strategy policy 1 identifies Salisbury as a principle settlement which is a strategically important centre and primary focus for development that will provide significant levels of jobs and homes, together with supporting community facilities and infrastructure, meeting its economic potential the most sustainable way to support better self containment.
18. Core Policy 2 sets out limits of development (development boundaries) and a presumption in favour of sustainable development at the principle settlements. In Salisbury, it sets out strategically important sites at Central Car Park (the neighbourhood plan is silent on this site); Churchfields and Engine Shed (Policy 17 relates to this site); Imerys Quarry (the Reg. 14 draft of the neighbourhood plan proposed an allocation for housing on this site which has now been withdrawn but may be brought forward in the review of the neighbourhood plan); Fugglestone Red (which has been delivered); Hampton Park (which has been delivered).
19. Core Policy 3 sets out requirements for new development to provide for necessary (1) essential infrastructure, and (2) place shaping infrastructure. The policy will be delivered by direct provision, planning conditions or planning obligations. Since it is not possible for the neighbourhood plan to anticipate what kind of development will come forward, nor what all necessary infrastructure requirements might be in relation to this policy and NPPF para. 57, the neighbourhood plan policies indicate where infrastructure will be required and what type, but leave the actual specification of the infrastructure and decisions on its delivery to the planning application stage. The neighbourhood plan therefore meets the requirements of NPPF para. 34 by setting out the contributions expected but leaving it to the delivery of Core Policy 2 (or subsequent policy) to determine how much and in what manner, infrastructure provision will be made by each development. Policy 2vi ensures that the City Council will be involved in these discussions as necessary.
20. The Core Strategy considers Salisbury as an “area” which is wider than the parish of Salisbury (the neighbourhood area) and thus, much of the planning authority’s approach is for a wider area than is covered in the neighbourhood plan. This has proven problematic at times, for instance when seeking clarification on the amount of housing required, and the relationship of Salisbury to other areas regarding green and blue infrastructure.
21. Throughout the preparation of the neighbourhood plan, the City Council has faced sometimes fierce opposition from WC which can be seen in the exchange of correspondence set out in Part 3 of the Consultation Statement. WC have in particular resisted
 - a. the allocation of land at Brown Street Car Park (though they promoted the site in the call for sites and it is also a potential allocation in the Core Strategy and in the Central Area Framework which is material to planning). Though WC’s policies promoted the redevelopment of Brown Street Car park, perversely, the council objected to the allocation as the landowner. This allocation was intended to be in support of an emerging Neighbourhood Development Order as it’s precursor. However, because of WC’s landowner objections, it was decided to remove the site from the final draft NDP, to halt progress on the NDO and to consider re-allocating the site in a future review of the neighbourhood plan;

- b. The allocation of land for housing at Imerys Quarry (known as Quidhampton Quarry in the Reg 14 draft) because of its designation as a waste and employment site and because of difficulties for access. Even though the site is located within the development boundary where Core Policy 1 says development should be focused, WC also objected to the site in the Habitats Regulation Assessment because it was deemed that since the site had not been allocated for housing, it had potential to give rise to groundwater and nutrient neutrality issues. Again, the steering group decided to defer the allocation to the review of the neighbourhood plan because these were matters that could not be resolved. WC also raised a number of objections to this proposed NDP allocation on minerals and waste grounds as well as Core Policy 20 which allocated the site for employment use. Though the City Council and steering group made representations that the minerals and waste issues had been dealt with through other permissions and the Core Policy 20 was undeliverable, WC continued to object. The Regulation draft local plan has now removed the employment allocation for this site.
 - c. WC also objected to the Churchfields Masterplan on the grounds that it was a strategic policy. However, as it will be explained below, Locality agreed with the steering group that the approach on this policy did not undermine the strategic policy (Core Policy 20).
22. The full extent of WC's response to the Reg. 14 draft and associated correspondence can be seen in the Consultation Statement (all parts).
23. The section in the Core Strategy entitled "Salisbury Area Strategy" was the starting position for the preparation of the neighbourhood plan policies. It had originally been intended that the neighbourhood plan would be on the same time-table as the Local Plan Review and the site allocations (now withdrawn) were meant to be in response to the Reg. 18 draft LPR documents. The steering group decided to withdraw the site allocations because the housing requirements might change and the LPA would not provide a housing figure, and because of WC's other objections. It was considered that the neighbourhood plan would need to be updated when the LPR finally concluded, many years behind schedule, and that the site allocations would be presented at that time if necessary.
24. The Core Strategy relies upon the Salisbury Vision which at the time that the neighbourhood plan was prepared was considered to be so dated as to be a "dead duck". It was therefore not relied upon and the neighbourhood plan steering group gathered fresh evidence. Other aspects of the core strategy, for instance the issues and considerations, are now very out-dated and do not reflect current economic circumstances, for instance around the role of retail. The Central Car Park project has been extremely slow to be delivered and funders seem to have disappeared. This is based on the Maltings Masterplan which is widely considered to be undeliverable. However, as this was considered to be "strategic", the neighbourhood plan is silent on this major Core Strategy proposal.
25. Proposed changes to the Wiltshire Fire and Rescue service have not been delivered nor have many of the necessary junction and transport improvements from the Salisbury Transport Strategy.

26. The fact that the Core Strategy, adopted in 2015 and relying on evidence that is even older, and that the local plan review has been very slow to progress and that evidence in support of the review was not shared with the City Council, has made it difficult to prepare neighbourhood plan policies, particularly when WC are objecting on the basis of core strategy policies and approaches that are clearly now not deliverable or realistic. This is particularly true with regard to the Churchfields Masterplan which will be discussed below.
27. Core Policy 20 has been delivered for: Fugglestone Red, Hampton Park, and is being progressed for the Central Car park. The neighbourhood plan is silent on these matters.
28. Core Policy 20 has not been delivered for Churchfields (which will be discussed below) and Imerys Quarry. Imerys Quarry was intended as a site allocation in the Reg. 14 draft plan but has been dropped in this Reg. 15 draft to be picked up in a review of the neighbourhood plan.
29. Core Policy 22 relates to the Salisbury Skyline which has been carried forward in Policy 9 which does not conflict with it – this will be discussed below. However, the City Council consider that the local plan should not contain a local policy on Salisbury’s views and that this matter should be led through SNDP policy 9.
30. Core Policy 34 supports the development of employment land in principal settlements, particularly that which has been allocated. Nothing in the policies in the neighbourhood plan are in conflict with this.

Strategic Environmental Assessment (SEA Directive 2001/42/EC)

31. Because the Regulation 14 draft NDP allocated land for housing, a full SEA was prepared and consulted upon. When the site allocations were dropped in this Regulation 15 draft, the City Council asked Wiltshire Council whether SEA was necessary. No response to this matter has been received. Therefore, in the interest of thoroughness and transparency, the SEA will be included in the supporting evidence for this Regulation 15 draft. It is probably not necessary however.

Habitats Regulations Assessment (Habitats Directive 92/43/EEC)

32. Wiltshire Council prepared a HRA for the Regulation 14 draft before it was issued for consultation. The City Council then added a new policy 5 to address the HRA conclusions. Because the site allocations were withdrawn and will not progress to submission, Wiltshire Council asked to see the draft again before it was submitted. Wiltshire Council has determined that Habitats Regulation Assessment will be required but has stated in an email that the SNDP can be submitted. Since the previous HRA assessed policies that are almost identical to those in the current draft SNDP, it is not anticipated that the HRA conclusions will be different.

Human Rights Legislation

33. Every effort was made to undertake all consultation in a fair and open manner and the consultation opportunities set out in the Consultation Statement were extensive. It is therefore considered that all reasonable efforts were made by the qualifying body to reach all members of its community and that no persons were discriminated against in the preparation of the plan.

Appendix 1

**NOTIFICATION OF THE DESIGNATION OF SALISBURY CITY
NEIGHBOURHOOD AREA UNDER SECTION 61G OF THE TOWN AND
COUNTRY PLANNING ACT 1990 AS AMENDED**

APPLICANT:

Salisbury City Council

APPLICATION:

Application for the Designation of Salisbury City Neighbourhood Area

An application has been received that includes a map which identifies the area to which the application relates, a supporting statement explaining why the proposed neighbourhood area is considered appropriate and a statement that the body making the application is a relevant body for the purposes of section 61G(2) of the 1990 Act.

DECISION:

The Designation of Salisbury City Neighbourhood Area is approved in accordance with section 61G of the Town and Country Planning Act 1990 as amended for the purposes of Neighbourhood Planning.

As the area specified in the application consists of the whole of the parish council's area it has been designated without consultation in accordance with Regulation 5A of the Neighbourhood Planning (General) Regulations 2012 as amended. This regulation 5A states amongst other things that where this regulation applies, regulations 6 and 6A of the Neighbourhood Planning (General) Regulations 2012 as amended do not apply.

A map of the designated neighbourhood area is provided on the following page.

Pursuant to the Wiltshire Council constitution (in particular Part 3D) the Executive Director for Growth, Investment and Place is authorised to designate neighbourhood areas.

I have no private interests to declare in respect of this matter which would prevent me from designating this neighbourhood area.

Signed:




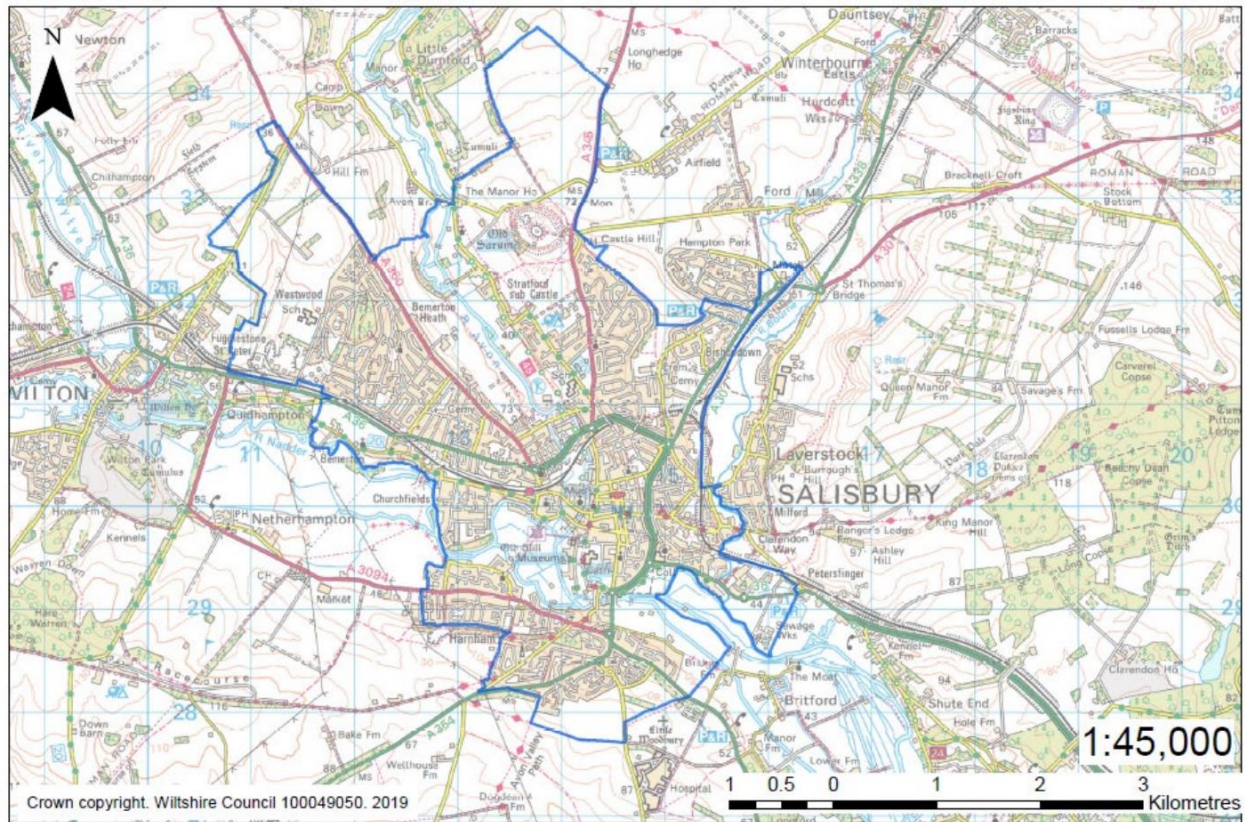
Alistair Cunningham
Executive Director
Growth, Investment and Place
Wiltshire Council

Dated: 18/07/2019

Map of Salisbury Neighbourhood Area

Salisbury Neighbourhood Area Designation Plan

 Neighbourhood Area Boundary



Appendix 2

Wiltshire Council

**NOTIFICATION OF THE DESIGNATION OF SALISBURY NEIGHBOURHOOD AREA
UNDER SECTION 61G OF THE TOWN AND COUNTRY PLANNING ACT 1990 AS AMENDED**

APPLICANT:

Salisbury City Council

APPLICATION:

Application for the Designation of Salisbury Neighbourhood Area

An application has been received that includes a map which identifies the area to which the application relates, a supporting statement explaining why the proposed neighbourhood area is considered appropriate and a statement that the body making the application is a relevant body for the purposes of section 61G(2) of the 1990 Act.

DECISION:

The Designation of Salisbury Neighbourhood Area is approved in accordance with section 61G of the Town and Country Planning Act 1990 as amended for the purposes of Neighbourhood Planning.

As the area specified in the application consists of the whole of the parish council's area it has been designated without consultation in accordance with Regulation 5A of the Neighbourhood Planning (General) Regulations 2012 as amended in 2016. Regulation 5A states amongst other things that where this regulation applies, regulations 6 and 6A of the Neighbourhood Planning (General) Regulations 2012 as amended in 2016 do not apply.

A map of the designated neighbourhood area is provided on the following page.

Pursuant to the Wiltshire Council constitution and in particular Part 3B the Neighbourhood Planning Manager is authorised to designate neighbourhood areas.

I have no private interests to declare in respect of this matter which would prevent me from designating this neighbourhood area.

Signed:

M Kilmister

Mike Kilmister
Neighbourhood Planning Manager
Wiltshire Council
Dated: 18th January 2022

Wiltshire Council



Appendix 3:

Having regard to national policies and advice contained in guidance issued by the Secretary of State

General conformity with the strategic policies in the development plan

Policy 1: Tree Planting for Carbon Capture

Conformity with national policies and advice

The government has made a commitment to make clear the expectation that trees, such as community orchards, should be incorporated in new developments and that streets should be tree lined.¹

The Green Infrastructure Framework² advocates the use of the Urban Greening Factor as a planning tool to increase the level of greening in urban environment which includes street trees. Neighbourhood planners are encouraged to set targets for green infrastructure provision. Preparation of a full-scale UGF is outside the scope of the current neighbourhood plan though it may be considered in a future review. For now, the use of a percentage coverage is in accordance with the suggested UGF surface cover measurement set out in 6.2 of Table 2 (Guidance on the specification and measurement of UGF Surface Cover Types for England)³.

NPPF para 131 states that trees make an important contribution to the character and quality of urban environments and also have a role in adapting to climate change. Planning policies and decisions should ensure that new streets are tree lined. that opportunities are taken to incorporate trees elsewhere in developments and appropriate measure are in place to secure long-term maintenance of newly-planted trees and that existing trees are retained wherever possible.

Policy 1 meets all these requirements and is therefor in conformity with national policy.

Conformity with the strategic policies in the development plan

This policy does not conflict with Core Policy 52 Green Infrastructure requires development to make a contribution to green infrastructure.

Policy 2: Air quality

Conformity with national policies and advice

¹ [The England Trees Action Plan \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612212/the-england-trees-action-plan.pdf) page 17.

² [Green Infrastructure Home \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/infrastructure/green-infrastructure/)

³ [UGF 3.3 User Guide \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/infrastructure/green-infrastructure/ugf/)

Since December 1997 each local authority in the UK has been carrying out a review and assessment of air quality in their area. This involves measuring air pollution and trying to predict how it will change in the next few years. The aim of the review is to make sure that the [national air quality objectives](#) (PDF) will be achieved throughout the UK by the relevant deadlines. These objectives have been put in place to protect people's health and the environment.

NPPF para. 186 requires planning policies to contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Zones and the cumulative impacts from individual development on local areas. These matters should be considered at the plan-making stage.

The neighbourhood plan has identified AQMAs in the neighbourhood area and has introduced this policy, which is in conformity with national advice and guidance to progress the requirements of para. 186.

Conformity with the strategic policies in the development plan

Core Policy 55: Air Quality requires development to demonstrate that it will effectively mitigate emission levels in the Salisbury AQMAs. WC provided additional wording suggested changes part of the Reg. 14 consultation which has been added (as set out in the Consultation Statement).

Policy 3: Carbon neutral development

Conformity with national policies and advice

The matter of how to manage carbon in the built environment is not clear at a national level and policies change frequently. The SNDP sought therefore to limit its carbon neutral aspirations to matters in the building regulations and other nationally recognised standards such as BREEAM and the Green Building Council's standards.

It is expected that the local plan review will contain strategic policies that will address this matter more fully but until the local plan is adopted, this policy meets basic expectations of national policy and best practice.

Conformity with the strategic policies in the development plan

Core Policy 41: Sustainable construction and low-carbon energy is now significantly out of date and it is understood will be significantly updated in the review of the local plan. Some aspects of the policy such as reference to the Code for Sustainable homes has now been withdrawn. In the meantime, Policy3 will provide interim guidance. WC did not object to this policy though a few changes were suggested and made to the Reg. 15 version (which has been discussed in the Consultation Statement). With these changes, it should be considered that the policy does not conflict with Core Policy 41.

Policy 4: Electric Vehicle Charge Points

Conformity with national policies and advice

Building Regulation Requirement S1 and reg. 44D electric vehicle⁴ requires that new residential buildings with associated parking must have access to electric vehicle charge points. There are a number of caveats to the requirements which are in more detail than required for planning. However, the provision of two charge points at one outlet does not conflict with the guidance but is a low-cost method of increasing the number of vehicles than can be charged at one outlet.

Guidance on “associated” parking spaces (for which EV charging should be provided) includes visitors.⁵

NPPF para. 107 allows to local parking standards for residential and non-residential development to take account of the need for EV charging.

Policy 4 as worded does not conflict with building regulations and is sufficiently generally worded to allow applicants to propose appropriate solutions that will be in accordance with them.

Conformity with the strategic policies in the development plan

The Core Strategy is silent on this matter.

Policy 5: Habitats Regulations

Conformity with national policies and advice

Wiltshire Council is the competent authority with regard to the Habitats Regulations and has prepared a Habitats Regulations Assessment for the neighbourhood plan.

The wording in this policy reflects discussion with the competent authority.

Conformity with the strategic policies in the development plan

This policy was included after discussion with WC Ecology officers who prepared the Habitats Regulations Assessment. This policy is in accordance with Core Policy 69.

Policy 6: Design in the built environment

Conformity with national policies and advice

NPPF para. 28 requires non strategic policies such as in neighbourhood plans to establish design principles. Para 127 requires plans to set out a clear design vision and expectations, and para. 128 requires planning authorities to provide design guides and codes. The Salisbury Design and Advertising Guide is based upon the former Salisbury District Council design policies which it has updated. Para. 129 provides for design guides to be prepared at the neighbourhood scale.

The Salisbury Design and Advertising Guide reflects policies in the National Model Design Code. It also makes extensive reference to the Planning Portal interactive house and guidance for applicants as well as other national guidance, for instance on the Green Infrastructure Framework and requirements from the Environment Act regarding biodiversity net gain. It refers directly to this

⁴ [Approved Document S: Infrastructure for the charging of electric vehicles \(publishing.service.gov.uk\)](#)

⁵ [Approved Document S: Infrastructure for charging electric vehicles, frequently asked questions - GOV.UK \(www.gov.uk\)](#)

national policy and advice and therefore does not conflict with it.

Natural Flood risk management is set out as a preferential approach in NPPF para. 161d.

Provision for the long-term maintenance of newly planted trees is set out in NPPF para. 131.

Conformity with the strategic policies in the development plan

Core Policy 57: ensuring high quality design and place shaping requires a high standard of development. The neighbourhood plan contains an updated Design and Advertising Guide that sets out local expectations to retain Salisbury's sense of place. It will assist applicants in complying with Core Policy 57.

Policy 7: The Close and its Liberty

Conformity with national policies and advice

Historic England were consulted in the preparation of this policy and were satisfied.

The purpose of this policy is to ensure that all development in The Close is considered within the context of the unified and unique area, and not merely in relation to neighbouring development. It is for this reason that the Close should be considered a single entity constituting the curtilage of Salisbury Cathedral and the Close Wall.

There was some debate with the LPA regarding the use of the word "curtilage" where the LPA concluded that only they were empowered to determine the curtilage of any historically important feature. The Steering Group has considered this and has retained reference to "curtilage" in the policy relying upon the definition: "the land surrounding a building that belongs to the owner of the building and for which he or she has responsibility" where the building in this case is the cathedral, and The Close is its curtilage as borne out in the historic development of the wall and the land within it.

Conformity with the strategic policies in the development plan

This policy is in conformity with Core Policy 58: Ensuring the conservation of the historic environment.

Policy 8: The Chequers

Conformity with national policies and advice

There are no national policies that directly relate to this policy other than what has already been discussed with regard to design for Policy 6.

Conformity with the strategic policies in the development plan

This policy is in conformity with Core Policy 58: Ensuring the conservation of the historic environment.

Policy 9: Protecting key views in Salisbury

Conformity with national policies and advice

NPPF para. 130 C requires planning policies should ensure that development is sympathetic to local character including landscape setting.

Conformity with the strategic policies in the development plan

There has been a long history of protecting key views in Salisbury and this policy was based on the former Salisbury District Local Plan and the Salisbury Conservation Area Management Plan. Both these historic documents have identified and protected the views of the cathedral now protected in Policy 9.

Other views of Old Sarum have been referred to at the suggestion of the LPA in their response to Regulation 14.

Core Policy 22: Salisbury Skyline policy was the basis for Policy 9 which has been updated, for instance by requiring that an LVIA is prepared but removing reference to economic viability (it is considered that economic viability is not affected by views). A new reference to Core Policy 20 was added in addition to text regarding views of Old Sarum at the request of WC.

It is considered that this is actually a local policy when considering the text in the NPPF para. 21 which states that strategic policies “should be limited to those necessary to address strategic priorities of an area”. The views of Salisbury Cathedral spire are really only relevant in relation to Salisbury and not Wiltshire and therefore are not strategic. By having a policy in the neighbourhood plan, the review of the local plan can focus on genuinely strategic matters for Salisbury.

This policy is in conformity with Core Policy 58: Ensuring the conservation of the historic environment.

Policy 10: Safeguarding and enhancing green and blue infrastructure

Conformity with national policies and advice

As the supporting text makes clear, the approach in this policy derives from the national environmental improvement plan (2023). This has already been discussed above in relation to Policy 1. Policy 10 makes explicit reference to the national green infrastructure principles and standards.

NPPF para. 92 requires planning policies to support healthy lifestyles through the provision of green infrastructure. Para. 20d states that strategic policies should set out policies on green infrastructure, and these policies were used as the basis of the neighbourhood plan’s approach as is explained in the supporting text. Para. 186 highlights how green infrastructure has a positive role to play in managing poor air quality, in line with Policy 2.

Conformity with the strategic policies in the development plan

Core Policy 50 biodiversity and geodiversity predates the 2023 green infrastructure approach introduced by government. However, Policy 10 does not conflict with the intent or provisions of Core Policy 50, only adds new evidence and advice.

Core Policy 52: Green Infrastructure is supported by Policy 10.

Policy 11: Biodiversity net gain

Conformity with national policies and advice

The overall purpose of policies 11 and 12 are to ensure that any gains required through the planning system for biodiversity improvement are of good quality and are either delivered on the site in question, or elsewhere within the neighbourhood area. The objective is that the policy is seeking to avoid off-site provision being made outside the neighbourhood area.

Biodiversity net gain (BNG) is a way to contribute to the recovery of nature while developing land. It is making sure the habitat for wildlife is in a better state than it was before development.

This will apply from November 2023 for developments in the Town and Country Planning Act 1990, unless exempt. It will apply to small sites from April 2024.

The requirement for 10% biodiversity net gain derives from the Environment Act 2021.

Wiltshire Council is in the process of preparing a Local Nature Recovery strategy but is only in the early stages at the time that the neighbourhood plan will be submitted under Reg. 15 of the neighbourhood planning regulations. It is therefore assumed that when the LRN is in preparation, the sites and approaches in the neighbourhood plan will be adopted in part or whole. When the WC strategy is adopted, it will set out provisions for taking developer contributions for off-site BNG with appropriate long-term management commitments. In the absence of that WC policy, Policy 11 (and Policy 12) the policy requires that the LPA and the City Council work together to retain BNG within the city limits (neighbourhood area).

Other aspects of the policy relate to design matters which have been already discussed above.

NPPF para. 174 requires planning policies to protect and enhance sites of biodiversity value and the wider benefits from natural capital and ecosystem services as well as providing net gains for biodiversity. Para 179 requires plans to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks which is what has been done in Appendix 2 and Appendix 3.

NPPF para 180 allows for BNG to be delivered off-site.

Conformity with the strategic policies in the development plan

Again, Core Policy 50 is now out of date and the neighbourhood plan policy is more up to date but there is no conflict.

Policy 11 supports Core Policy 52 and adds more up to date evidence and advice but does not conflict. Policy 11 relies on the most up to date evidence on green infrastructure provided by WC as required in Core Policy 50.

Policy 12: Habitat improvement and restoration schemes

Conformity with national policies and advice

Please see commentary regarding Policy 11 which applies here.

Conformity with the strategic policies in the development plan

Again, Core Policy 50 is now out of date and the neighbourhood plan policy is more up to date but there is no conflict.

Core Policy 69: Protection of the River Avon SAC is supported by this policy.

Policy 13: Open space provision

Conformity with national policies and advice

NPPF para. 8 includes open spaces as part of sustainable development's social objective. Para. 84 requires policies to retain and develop accessible open spaces, and para 93 requires plans to plan positively for the provision and use of open spaces. Para 98 states that open spaces are important for the health and well-being of communities and should address qualitative and quantitative deficits or surpluses.

Policy 13 relies upon Appendix 4 which sets out broad suggestions how each space could be enhanced. It should be noted that the suggested improvements relate mainly to potential biodiversity and GBI improvements – this policy is intended to safeguard the environmental benefits of open spaces in Salisbury above and beyond their use for human activity as allotments, playing fields, parks, etc.

Conformity with the strategic policies in the development plan

Core Policy 52: Green infrastructure makes provision for accessible open spaces in accordance with the requirements in the Wiltshire Open Space standards. These standards are now out of date and are being updated (but not publicly available) in support of the local plan review. The neighbourhood plan steering group worked closely with officers from WC to obtain the most recent evidence and also provided its own evidence to the WC open space survey.

Policy 14: Local Green Spaces

Conformity with national policies and advice

This allocation is for the same sites as for Policy 13 Open Spaces. The reason for this is to ensure that there is enduring protection of these sites by adding another layer of protection, thus "raising the bar" in cases where landowners wish to seek their redevelopment.

The relevant clauses of NPPF 2021 paras. 101-103 have been included and Appendix 4 explains why they meet the requirement for para. 102b. All sites are within the parish boundary and therefore comply with para. 102a and 102c.

The Reg. 14 consultation process was procedurally incorrect in that landowners for potential green spaces should have been contacted before Reg. 14 consultation and this was not done. The City Council addressed this shortcoming by undertaking a further consultation to all landowners which is set out in detail in the Consultation Statement Part 3. Only one landowner objected and that site was removed from the list of designations. This policy and its supporting procedure therefore now meets its basic conditions in this regard.

Conformity with the strategic policies in the development plan

The Core Strategy is silent on this matter.

Policy 15: Construction and development management for projects affecting the River Avon SAC

Conformity with national policies and advice

NPPF para. 181 provides significant protection for Special Areas of Conservation.

Conformity with the strategic policies in the development plan

Policy 15 was written to specifically support Core Policy 69: Protection of the River Avon SAC and is not in conflict.

Policy 16: Housing mix and affordable housing.

Conformity with national policies and advice

NPPF 2021 para. 62 requires housing policy to consider the size, type and tenure of housing which this policy does, based on a local housing needs assessment for Salisbury. Para. 63 states that such policies should specify the type of affordable housing needed.

The Housing Needs Assessment indicated a particular requirement for affordable housing for young people/families and for older people. The Reg. 14 draft of the plan contained three housing allocations that were targeted at these groups. However, the landowners of two of the sites did not support the allocation (National Grid and Wiltshire Council) and the third (Quidhampton Quarry) had outstanding access issues. The steering group is pursuing Neighbourhood Development Orders on the National Grid and Wiltshire Council sites and it was felt that protracted negotiations with the landowners would unacceptably delay the progress of the neighbourhood plan. Furthermore, the quarry site had outstanding access issues that required further work and this would also have taken some time to resolve. The steering group decided that it would be better to progress the neighbourhood plan without the allocation, to retain the housing needs work embodied in Policy 16, and to include any site allocations in the review of the neighbourhood plan (probably in 2025).

Conformity with the strategic policies in the development plan

Core Policy 43: Providing Affordable Homes sets an overall requirement for 40% affordable housing on schemes delivering 5 or more dwellings in Salisbury which is what Policy 15 requires. Core policy 43 requires that tenure is agreed on a site by site basis which can now be considered to be an approach in conflict with NPPF para. 62 as discussed above. The neighbourhood plan policy therefore goes farther than Core Policy 43. Its provisions have been adjusted according to comments from WC as set out in the Consultation Statement and it should now be acceptable to both WC as planning authority and the housing team.

Core Policy 45: Meeting Wiltshire's Housing needs type mix and size requires a mix of housing types that are expected to reflect demonstrable need from that community. Therefore, Policy 16, which relies upon an up to date housing needs assessment, is in conformity with this policy.

Policy 17: Churchfields and the Engine Shed site

Conformity with national policies and advice

This policy is largely a design policy though it has implications for housing delivery, environmental improvement and economic development. The site is allocated in the Development Plan as a

housing site for 1100 houses (see below). It is also a key industrial area for Salisbury. However, though it may have been a good location for commercial activities when it was first established, it has become busy and has led to an increase in traffic, particularly from HGV (commercial and waste) and cars which has a harmful impact on the Salisbury conservation area which the traffic must travel through. These matters are described in the Churchfields Masterplan document in more detail.

The purpose of this policy is to seek to reduce these traffic impacts whilst encouraging a natural progressive shift away from commercial uses (if that is what landowners wish) to housing schemes that are denser and also fit for the housing target groups of younger people which were identified in the Housing Needs Assessment as needing affordable homes. The policy seeks to encourage innovative approaches to housing, introducing a mix of housing types including flats and live/work units. It also seeks to protect and enhance the very high quality natural environment provided by the River Nadder Corridor.

NPPF para. 69 refers to the role that small and medium sites can make to meeting housing requirements and para. 70 states that neighbourhood planning groups should also give particular consideration to allocating small and medium-sized sites. However, these paragraphs do not preclude neighbourhood plans from looking at larger sites, but in any event, Core Policy 20 has already allocated that site for housing. Therefore, the policy is not allocating this site nor is it undermining the strategy policy which is precluded in NPPF para. 29 as will be discussed below. This interpretation of paras. 69 and 70 has been discussed with planners at Locality who concur that the approach taken here with the masterplan does not conflict with the NPPF.

Moving onto the matters of design and economic development, the masterplan sets out a framework for how future development might proceed, in instances where landowners may wish to redevelop their sites. The policy does not favour housing or commercial uses, but offers design guidance for either form of redevelopment. Where housing is favoured, it encourages that different design approaches are considered here that would not be acceptable elsewhere in Salisbury, for instance for flats or live-work units aimed at younger people.

NPPF para. 81 states that policies should positively and proactively encourage sustainable economic growth and productivity, taking into account both local business needs and wider opportunities for development. This is exactly what the Churchfields Masterplan is seeking to do: the need for commercial activities here is obvious because the sites are either occupied or are redeveloped quickly. However, the traffic access issues that affect this site, particularly for larger businesses or businesses that require larger articulated lorries, may eventually lead these businesses to find other sites in the area that better meet their needs. Where this is the case, this policy allows a flexible approach to new commercial activity, whilst also allowing for innovative approaches such as live-work units and residential uses (which command higher land values) to be included in the mix in a way that will create a vibrant economic/residential area in the city. The site is adjacent to the railway station and within 15 minutes level walk to the City centre and is therefore a sustainable location for smaller businesses.

Matters of design have already been discussed above, particularly with regard to Policy 6. The Churchfields Masterplan sits beside Policy 6 and has taken account of the strategic view of the cathedral spire.

For all these reasons, Policy 17 is in conformity with national policies set out in the NPPF.

Conformity with the strategic policies in the development plan

Core Policy 35: Existing employment sites retains this site for employment purposes, and “proposals

for renewal and intensification of the above employment uses within these areas will be supported.” Renewal of Churchfields is the core function of the masterplan which sets out sound design principles how this should be achieved.

Core Policy 35 goes on to say that a consideration whether redevelopment of employment land must show that the site is not appropriate for the continuation of its present or any employment use due to significant detriment to the environment or amenity of the area. In this case, the main detriment that commercial activity in Churchfields causes is the impact of vehicles (particularly HGVs) on the conservation area and city centre. Should other sites outside Churchfields become more attractive to existing commercial uses, and they should choose to relocate, it would be beneficial to the wider Salisbury environment and amenity to have lower impact uses, such as housing and live-work spaces, to take its place. This is in conformity with Core Policy 35, particularly in regard to clause vi which states: “The change of use is to facilitate the relocation of an existing business from buildings that are no longer fit for purpose to more suitable premises elsewhere within a reasonable distance to facilitate the retention of employment.

With regard to the Engine Shed site, Core Policy 36 specifically recognizes that neighbourhood plans can support the regeneration of brownfield sites.

Core Policy 56: Contaminated land is likely to be relevant to any redevelopment falling under the Churchfields masterplan since it is believed that some or most of the land in the area may be contaminated to some degree. However, this is a matter that should be addressed in planning decisions and therefore the neighbourhood plan has not made any specific provisions regarding contaminated land but rather defers to Core Policy 56.

Core Policy 65: Movement of goods states in Clause iv that where carriage of freight by rail and water is not realistic, encouragement will be given for heavy goods vehicles (HGVs) traffic to use those roads where a minimum of community and environmental impacts will occur. This is what Policy 16 is seeking to achieve by facilitating the relocation of businesses that generate HGV traffic in the city centre.

Starting on page 388 of the Core Strategy, the strategic policy intentions of Core Policy 20 are set out for Churchfields and the Engine Shed site which sets out how to deliver 1,100 homes and retain 5 ha of employment land through a high quality masterplan which delivers an appropriate sense of place in accordance with the Creating Places design guide. The masterplan was never produced and the neighbourhood plan Design and Advertising Design Guide was based on the Creating Places design guide. These relationships to Core Policy 20 and Creating Places are set out in the Churchfields Masterplan and the Salisbury design guide respectively. It can be seen that the wording of the Churchfields Masterplan closely reproduces aspects of the Core Strategy approach, sometimes word for word. The Churchfields Masterplan also takes account of other material considerations such as the Central Area Framework (not part of the Development Plan) and other documents produced by Wiltshire Council.

The main point to make here is that the promise for a masterplan in Core Policy 20 was not kept, and the neighbourhood plan has filled that gap with an up to date Masterplan based on up to date evidence and aligned to the remainder of the neighbourhood plan policies.

The delivery mechanism (Core Strategy page 393) is based on WC undertaking site assembly and “decanting” or moving existing businesses. In its correspondence with the steering group, WC made it clear that it had abandoned the approach to “decanting”. In response, the Churchfields

Masterplan takes a different approach: it allows for the natural evolution of the site, based on land-owners preferences and needs, but accommodates a shift to residential units if that is what the market seeks. It provides examples of how this shift to residential land uses but does not require them, nor does it expect existing businesses to relocate.

It should be noted that para. 4.44 of the Wiltshire Housing Site Allocations Plan (Feb 2020 and part of the Development Plan) states that this aspect of Policy 20 has not been delivered and correspondence with WC in preparation of the neighbourhood plan has indicated that the housing contribution of 1,100 homes is not included in the most recent calculations of housing need/delivery for the review of the local plan. However, para. 4.44 still relies on “decanting” employment uses which, history has shown, is not realistic. Any shift in the balance of land uses for this part of Salisbury MUST occur through natural change initiated by land owners in the private market, and not through a grand relocation programme instigated by local government.

For this reason, though aspects of Core Policy 20 are not being accepted in the Churchfields Masterplan, this is because (a) WC did not produce a masterplan though one is clearly required and this gap has been filled by the neighbourhood plan, and (b) the mechanism of “decanting” existing businesses to make way for housing has proven unrealistic and the neighbourhood plan is using a more evolutionary approach.

Policy 18: Healthcare facilities

Conformity with national policies and advice

The steering group worked closely with representatives of the NHS to explore whether new facilities would be required in Salisbury. Though Salisbury hospital (outside the neighbourhood area) is an important component in local healthcare provision, local services in the form of GP practices and other community-based health services will continue to require land and buildings within the urban area. This policy seeks to clarify the need for future health care facilities over and above what may be provided at Salisbury Hospital based on information provided by NHS representatives.

The main issue faced by NHS providers is that the NHS procurement system is very slow and it is difficult to compete for land and buildings on the private market which turns around more quickly. The NHS stakeholders indicated that when they were in a position to consider land acquisition, they were priced out of the market or faced difficulties from planning restrictions. The purpose of this policy is therefore to help make it easier for NHS providers to compete in the commercial property market and to encourage landowners who are disposing of large buildings to open discussions with the NHS.

NPPF 2021 para. 8a includes the provision of infrastructure as a component of sustainable development’s economic objectives and para. 11 requires plans to align growth and infrastructure. The approach taken where the steering group worked with the NHS to identify health infrastructure requirements is in conformity with para. 16c. NPPF para. 20c indicates that strategic policies should include consideration of health infrastructure, but it does not preclude neighbourhood plans from looking at local requirements. Therefore, though the hospital might logically fall under a strategic policy since it serves a wide area, neighbourhood plan policy 18 is specifically about local provision and therefore not strategic in conformity with para. 28.

This policy is also designed to sit beside one of the (now withdrawn) site allocations for Brown Street where it was hoped that a NHS and affordable housing scheme could be realised. This was being pursued separately through a neighbourhood development order.

The policy is silent on how para. 57 should be applied regarding local healthcare provision, for instance how other development might make a contribution towards necessary healthcare provision or how CIL funding will be spent towards it since this is considered to be strategic and beyond the remit of a neighbourhood plan.

Conformity with the strategic policies in the development plan

The Core Strategy is largely silent on this matter.

Policy 19: Community infrastructure

Conformity with national policies and advice

The purpose of this policy is to ensure that new housing development will make provision for its own community infrastructure. The survey evidence shows that existing community infrastructure is already used to capacity so it will be necessary for most developments to make provision for new infrastructure. The policy does not provide a standard for infrastructure because this is a strategic policy and Wiltshire Council have not produced such a standard.

In addition to the provisions made for health infrastructure (above) which apply here, NPPF para. 92 states that planning policies should provide social interaction including opportunities for meetings between people and in para. 93 to provide social, recreational and cultural facilities including community facilities.

Conformity with the strategic policies in the development plan

Core Strategy policy only discussed the protection of community facilities in a rural context and is silent on urban settings.

Policy 20: Allotments

Conformity with national policies and advice

NPPF para. 93c states that planning policies should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, for example through provision of allotments. The existing allotments are at capacity and it is therefore appropriate to require new development to make provision, for instance on larger housing schemes.

Some developments, for instance in the conservation area, would not be suitable for new allotment provision, but food growing might be achieved in other ways but new developments could still make provision in different ways for food growing in keeping with the green infrastructure policies already discussed above.

Conformity with the strategic policies in the development plan

Core Policy 52 Green Infrastructure does not mention allotments.

Policy 21: Provision for play and sport

Conformity with national policies and advice

The policy draws on national policy from the charity Play England and uses locally derived data to explore the role of play and sport in Salisbury.

The policy is in conformity with NPPF para. 102b protects existing playing fields from redevelopment.

The policy encourages landscaping schemes to include opportunities for informal play which is in conformity with NPPF para. 92 which promotes healthy lifestyles, including accessible green infrastructure.

Conformity with the strategic policies in the development plan

The Core Strategy is silent on play and sport facilities.

Policy 22: Sustainable transport

Conformity with national policies and advice

All developments that will generate significant amounts of movements should provide a travel plan according to NPPF para. 113 and this policy is aimed mainly at those developments, setting out local requirements.

NPPF para. 104 requires transport issues to be considered from the earliest stages of plan making and this policy refers to the Salisbury Transport Strategy. The policy seeks to address potential impacts of development on Salisbury and in particular requires development to demonstrate a reduction in cars driving into the city centre (and inside the ring road). The mention of larger vehicles is an indirect reference to Churchfields where larger vehicles numbers should be reduced for the reasons stated above.

The requirement for sustainable transport schemes to align with GBI is in keeping with NPPF para. 112c which requires proposals that minimise conflicts between pedestrians, cyclists and vehicles and respond to local character.

Conformity with the strategic policies in the development plan

Core Policy 60: Sustainable transport promotes alternatives to the car and assessing/mitigating the impacts of transport on community and the environment. Policy 22 does not conflict with this policy.

Core Policy 61: transport and new development encourages new development to make providing for sustainable transport in preference to the private car. Policy 22 does not conflict with this policy.

Policy 23: Cycling and walking infrastructure

Conformity with national policies and advice

NPPF para. 112 states that applications should give priority to walking and cycling. Wiltshire Council has prepared a Local Cycling and Walking Infrastructure Plan which is strategic and must take priority over any local policies in accordance with NPPF para. 106. However, some developments may be able to support local priorities, particularly where these provide access to GBI, and the policy seeks to promote these opportunities where possible.

Conformity with the strategic policies in the development plan

Core policy 60 promotes sustainable transport alternatives to the use of the private car.

Policy 24: Cycle parking

Conformity with national policies and advice

This policy is in support of NPPF para. 106d which requires planning policies to provide for attractive and well-designed cycling networks with supporting facilities such as secure cycle parking.

Conformity with the strategic policies in the development plan

Core policy 61 prioritises cycling over all other modes of transport except that for the visually impaired/disabled and pedestrians. This NDP policy provides a “sustainable transport improvement” as set out in the policy.

Policy 25: Cycling for pleasure

Conformity with national policies and advice

The purpose of this policy is to facilitate healthy lifestyles (NPPF para. 92c and para 93a) and to encourage more Salisbury residents to become comfortable with cycling to encourage modal shift (NPPF para. 104c).

Conformity with the strategic policies in the development plan

Core policy 61 prioritises cycling over all other modes of transport except that for the visually impaired/disabled and pedestrians. This NDP policy provides a “sustainable transport improvement” as set out in the policy.

Policy 26: Residential parking

Conformity with national policies and advice

The purpose of this policy is to support applicants who wish to reduce their reliance on cars and not to make provision for car parking. This would be particularly relevant in instances in the city centre where it is not possible to provide car parking which can be accessed via public car parks, or avoided entirely by living life on foot and with public transport.

The reference to on-plot parking is a design matter (see discussion above) that seeks to reduce new on-street parking which can lead to congestion.

NPPF 108 discussed how plans can set maximum parking standards. This policy seeks to allow a minimum (null) provision because of adequate provision of walking and cycling opportunities (NPPF 107).

Conformity with the strategic policies in the development plan

Core Policy 57 requires a high standard of design so that development is complementary to the locality, responding positively to the existing townscape and streetscape. Car parking should ensure that as part of the public realm, should be designed to create places that are safe and accessible.

Policy 27: Working from home and live-work units

Conformity with national policies and advice

The purpose of this policy is to support the Churchfields Masterplan and provide new homes that might better accommodate new ways of working for instance home-working and live-work units. Neither of these residential types are prevalent in Salisbury and this type of development would therefore be a departure from the norm and worthy of a separate planning policy.

The reference to permitted development changes for community work hubs to C3 (should this be proposed) is to ensure that the community facility will be retained under Policy 19: Community infrastructure.

The relevant references to national policy have already been provided above.

Conformity with the strategic policies in the development plan

The Core Strategy is silent on this matter.

Policy 28: Visitor Accommodation

Conformity with national policies and advice

The NPPF is silent on this matter.

Conformity with the strategic policies in the development plan

Core Policy 39: Tourist Development supports proposals for tourist development of an appropriate scale and this policy is therefore in conformity with it. Core Policy 40: Hotels, bed and breakfasts, guest houses and conference facilities also supports proposals for new and extended visitor accommodation in principal settlements.

Policy 29: Post offices

Conformity with national policies and advice

Salisbury has suffered the loss of many banks and most of its post offices. Banks and post offices are critical community infrastructure and in need of protection. Permitted development rights (Class MA) may put some post offices at risk so for clarity, these have been defined in Salisbury as Class F so that they can be protected under policy 19. There is no way to protect banking services generally.

Conformity with the strategic policies in the development plan

The Core Strategy is silent on this matter.

Policy 30: Major food retail

Conformity with national policies and advice

The purpose of this policy is to discourage the generation of additional traffic. It is hoped that if major food retail can be more evenly distributed around the ring road, that new traffic will not be required to travel as far. This is in conformity with NPPF 104b by seeking to use location of new development to change transport usage.

Conformity with the strategic policies in the development plan

Core Policy 38: Retail and leisure requires that larger schemes in excess of 200 sq m should be

accompanied by an impact assessment. The provision of this policy and the supporting text will of necessity be included in that assessment, thus bringing Salisbury's unique circumstances under this policy.

Appendix 4:

Having regard to national policies and advice contained in guidance issued by the Secretary of State

General conformity with the strategic policies in the Wiltshire Council Local Plan Pre-Submission Draft 2020 – 2038 (October 2023)

- 34. Salisbury retains its role as a Principal Settlement (Policy 1).
- 35. The total requirement to 2038 is 160ha of new employment land (Use Class B2, B8, E(g)(i-iii) and approximately 36,740 homes (Policy 2). In addition, new housing development will be delivered in a way that prioritises the release of employment land, and the re-use of previously developed land to deliver regeneration opportunities is supported to limit the need for development on Greenfield sites.
- 36. Salisbury's housing need is 11,015 dwellings, and 32.1 hectares of employment land (Table 4.1). The residual figure for Salisbury is 1530 dwellings (Table 4.6), and 12.3 ha. of employment land (Table 4.7). The neighbourhood area designation requirement is 60 dwellings (Policy 22).
- 37. Salisbury is identified as a Constrained Settlement in Table 3.2. At these 'constrained settlements' scales of growth are balanced with the need to help each community thrive and work toward the achievement of local priorities.
- 38. Policy 22 set out the development framework for Salisbury.

Policy 1: Tree Planting for Carbon Capture

Emerging policy 90 Woodland, Hedgerows and Trees (5) seeks to increase street tree cover in urban areas which is in line with SNDP policy 1.

Emerging policy 98 vii requires the inclusion of tree-lined streets and tree planting elsewhere which is in keeping with SNDP policy 1.

Policy 2: Air quality

The SNDP policy is in accordance with emerging policy 101 Air Quality and there are no conflicts.

Policy 3: Carbon neutral development

Emerging policy 85 Sustainable Construction and Low Carbon Energy sets out specific requirements for new building that exceed those in the Core Strategy. SNDP Policy 3 is an interim policy. When the new local plan policy is adopted, it is likely that SNDP policy 3 will become redundant.

Policy 4: Electric Vehicle Charge Points

There are no conflicts with emerging policy 70 Sustainable Transport though the SNDP provides greater detail.

Policy 5: Habitats Regulations

There is no specific policy relating to habitats regulations in Salisbury in the emerging plan though emerging Policy 88 provides a strategic context for policy 5. There are no conflicts between the policies.

Policy 6: Design in the built environment

The Salisbury Design and Advertising Guide discusses conversion of Class E to dwellings in some detail. Emerging policy 68 restricts these changes of use which is not in conflict with the guide. The guide provides advice where emerging policy 68 would allow the conversion. It is considered that the policies are complementary.

Emerging policy 98 Ensuring High Quality Design and Place Shaping i requires development to respond to local distinctiveness which is defined in the SNDP and the Salisbury Design and Advertising Guide. Clause xi refers to local design guidance which is provided in the Salisbury Design and Advertising Guide. These policies are complementary.

Emerging policy 99 protects the historic environment and the SNDP provides local detail how this should be done.

Policy 7: The Close and its Liberty

Emerging policy 98 iii and iv requires development to respond positively to existing townscape and distinctive characteristics of the built form. This detail is provided in Policy 7.

Emerging policy 99 protects the historic environment and the SNDP provides local detail how this should be done.

Policy 8: The Chequers

Emerging policy 98 iii and iv requires development to respond positively to existing townscape and distinctive characteristics of the built form. This detail is provided in Policy 8.

Emerging policy 99 protects the historic environment and the SNDP provides local detail how this should be done.

Policy 9: Protecting key views in Salisbury

Emerging policy 22 Salisbury Principal Settlement clause 3 is compatible with this SNDP policy which adds local detail.

Policy 10: Safeguarding and enhancing green and blue infrastructure

This policy is in keeping with the Spatial Vision: *Our environment will have been enhanced through a comprehensive range of measures that include meaningful Biodiversity Net Gain, nature recovery programmes, access to quality open spaces and responsible management of natural resources.*

Emerging policy 93 Green and Blue Infrastructure will require the retention and enhancement of the GBI network which is identified in detail in Appendixes 1-3 in the SNDP and policies 11 and 12. The two policies are complementary and there is no conflict.

Emerging policy 98 Ensuring High Quality Design and Place Shaping ii requires the retention of existing landscape features to enhance biodiversity and to create wildlife and recreational corridors. These policies are complementary and the SNDP provides local evidence in support of the emerging policy.

Policy 11: Biodiversity net gain

This policy is in keeping with the Spatial Vision: *Our environment will have been enhanced through a comprehensive range of measures that include meaningful Biodiversity Net Gain, nature recovery programmes, access to quality open spaces and responsible management of natural resources.*

Emerging policy 88 Biodiversity and Geodiversity sets out general expectations how biodiversity should be managed whilst SNDP policy 11 sets out the specific requirement that net gain will be delivered within the city alongside Policy 12. There is no conflict between the two approaches.

Emerging policy 89 Biodiversity Net Gain sets out a 20% target where the SNDP only set out a 10% target in line with the Environment Act. If the higher target is adopted, then the SNDP target will need to be raised accordingly in the review in 2025. SNDP policy 12 identifies nearby habitats that should be the focus of off-site BNG which is compatible with Policy 89 (3). The Salisbury Design and Advertising Guide and Policy 6 requires a 25 year management plan whereas Policy 89 requires a 30 year management plan. The SNDP policy can be amended at the time of the review if this proves necessary.

Policy 12: Habitat improvement and restoration schemes

Policy 27 proposes a SANG (Policy 29) in the same area as the Lime Kiln Down habitat improvement scheme. The emerging local plan and the SNDP policies are complementary and seek the same outcome of habitat improvement at this site.

The wording of the SNDP policy might need to be modified to reflect the wording of Policy 29 when the new local plan is adopted to reflect the creation of the SANG.

Policy 13: Open space provision

Emerging policy 84 Public Open Space and Play Facilities sets the strategic framework for the local SNDP Policy 13 which identifies existing open space provision. They are not in conflict.

Policy 14: Local Green Spaces

There are no emerging policies on this.

Policy 15: Construction and development management for projects affecting the River Avon SAC

The emerging policy does not specifically address this matter though emerging policy 88 provides a strategic framework for policy 15. There is no conflict.

Policy 16: Housing mix and affordable housing.

Emerging policy 76 sets out the requirement for 40% affordable housing which is in agreement with SNDP policy 16. Policy 76 requires First Homes and requires development to take account of local evidence. The SNDP based on its own housing needs assessment is therefore complementary to this emerging policy.

Policy 16 is also not in conflict with emerging policy 78 Meeting Wiltshire’s Housing Needs which also makes reference to local housing needs, which again, has been discussed in the Salisbury housing needs assessment.

Policy 17: Churchfields and the Engine Shed site

This SNDP policy is not in conformity with the emerging strategic approach proposed in Policy 22 which makes a significant departure from Core Policy 20 which promoted the site for residential uses, and now switches the focus to employment uses. The City Council will object to this change in local plan policy and it cannot therefore be considered that this emerging policy will survive intact at adoption.

Emerging policy 34 is a significant change in direction from Core Policy 20 and is considered to be undeliverable as currently drafted. It is not the purpose of this Basic Conditions statement to address the deficiencies of this proposed local plan policy, but some of the key areas of concern are:

- Wiltshire Council controls much of the land in this area (see the Churchfields Masterplan) but makes no attempt to reduce the negative impact of its operations and land holdings on the rest of Salisbury, particularly related to transport and waste operations.
- The supporting text speaks of supporting the site’s “evolution and diversification” but the policy does not seek to do this in a manner that will reduce negative impacts on the rest of Salisbury by (a) providing housing that can access the city centre by walking and cycling, and (b) by reducing commercial traffic through the city centre and conservation area. The policy will have the opposite effect of reducing accessible housing opportunities and increasing commercial traffic in the conservation area.
- An Estate Regeneration Plan and Accessibility study is promised to reduce harmful environmental impact including traffic, but since this has not been done, it cannot be proven that these widely recognised impacts can be sufficiently managed. Without the certainty that the policy can be delivered in a sustainable manner, it should not be adopted. The regeneration plan and accessibility study should have been prepared before the policy was proposed to demonstrate that it can be delivered as intended.
- The Churchfields masterplan gives detailed consideration how design can create positive incremental improvements in the Churchfields environment. Policy 34 lacks any detail how the estate can “evolve and diversify” and lacks credibility and specific proposals in comparison to the SNDP policy 17 and its masterplan.

Emerging Policy 65 protects existing employment land and requires that proposals that lead to the material loss of employment land, as envisaged in the Churchfields Masterplan, must make provision for replacement with similar size and quality nearby. For the Churchfields masterplan proposals which seek some replacement of employment with residential land uses, this would imply that only relocations of existing businesses to new site would be supported under this policy. However, clause iii allows for the reuse of a site for alternative uses for significant environmental and social benefits to the settlement that outweigh the loss of employment land. It can therefore be argued that the Churchfields Masterplan conforms with clause iii because it will have wider benefits to Salisbury by providing sustainably located housing, mixed use and incubator business areas, and will ultimately reduce traffic impacts on the city centre.

SNDP policy 16 requires larger residential development to make provision for community facilities to meet its own needs which is not a requirement of emerging policy 19 though the emerging policy supports the creation of new facilities. Therefore, it can be considered that the SNDP provides additional local requirements that are compatible with the emerging policy.

Policy 18: Healthcare facilities

Emerging policy 83 Health and Wellbeing requires a Health Impact Assessment to be prepared. This is a different approach to SNDP policy 18 which supports new provision in the central part of the city. There is no conflict.

Policy 19: Community infrastructure

Emerging policy 81 Community Facilities resists the loss of community facilities similar to SNDP policy 19. However, where the SNDP “resists” loss, policy 81 allows for loss under certain circumstances. However, both policies seek to have equivalent replacement for losses. The emerging local plan policy sets out a narrower set of circumstances where this applies (excluding for instance general meeting rooms for hire).

Policy 20: Allotments

There are no emerging policies on allotments.

Policy 21: Provision for play and sport

Emerging policy 84 Public Open Space and Play Facilities sets the strategic framework for the local SNDP Policy 21. They not in conflict.

Policy 22: Sustainable transport

There are no conflicts with emerging policy 70 Sustainable Transport.

Policy 23: Cycling and walking infrastructure

There are no conflicts with emerging policy 70 Sustainable Transport.

There are no conflicts with emerging policy 71 Transport and New Development.

Policy 24: Cycle parking

There are no emerging policies on cycle parking.

Policy 25: Cycling for pleasure

There are no conflicts with emerging policy 70 Sustainable Transport.

There are no conflicts with emerging policy 71 Transport and New Development.

Policy 26: Residential parking

There are no emerging policies on residential parking in Salisbury though Policy 73 makes reference to managing parking provision and parking standards.

Policy 27: Working from home and live-work units

There are no specific policies on working from home or live-work units.

Policy 28: Visitor Accommodation

There are no specific policies on visitor accommodation.

Policy 29: Post offices

There are no specific policies on post offices.

Policy 30: Major food retail

Policy 30 seeks to direct major food retail to areas where there is poor provision. These areas are outside the city centre. Though emerging policy 67 will be a factor in the decision, it is not considered that SNDP policy 30 is in conflict.

Appendix 5: Salisbury City Council argument objecting to Wiltshire Local Plan Review Regulation 19 draft

Salisbury City Council

Response to Wiltshire Council Local Plan Review

November 2023

Argument in support of the City Council's response

Prepared by Dr Andrea Pellegram MRTPI

Introduction

1. This argument is provided to give an overview of Salisbury City Council's (SCC's) concerns regarding the preparation of the Local Plan Review (LPR) and to assist the Local Plan Inspector(s). This response draws significantly from evidence gathered by SCC during the preparation of the Salisbury Neighbourhood Development Plan (SNDP).

The SNDP

2. The SNDP has been prepared and is ready for submission pending a response regarding Habitats Regulations Assessment (HRA). However, the Local Planning Authority (LPA) has indicated that the SNDP could be submitted in its current form and the SNDP Examiner could address any HRA matters that might arise. It should be noted that the SNDP has already been subject to HRA assessment and the policies have already been assessed and amended accordingly. The difference between the Regulation 14 and Regulation 15 drafts of the SNDP revolve almost entirely around the decision to drop three housing allocations. SCC considers that because of the removal of housing allocations, HRA implications will be reduced and expects that no major modifications will be required.
3. SCC began preparation of the SNDP in 2018 and since its start, it has had a hard working steering group that met every month to progress its policies. The steering group made up of community volunteers and City Councillors disbanded in September 2023 because its work was done.
4. The SNDP was based on extensive public consultation over a range of media including direct surveys, online surveys, work with special interest groups such as the Salisbury Area Green Space Partnership and the Salisbury Civic Society, and also undertook original research such as a Housing Needs Assessment, an assessment of Community Infrastructure and two design guides (one of which was for Churchfields). A Strategic Environmental Assessment was also undertaken for the Regulation 14 draft in support of the housing allocations.
5. The SNDP's vision is complex but at its heart, it is a plan that seeks to tackle climate change head on by creating a more natural and resilient Salisbury that can withstand the environmental challenges it faces in a proactive and constructive manner. It also originally sought to provide significant levels of housing on brownfield land, but all the SNDP site

proposals were objected to by Wiltshire Council either as local planning authority or as land owner.

6. The SNDP and its supporting documents including the Basic Conditions Statement and Consultation Statement, as well as the Regulation 14 draft, can be accessed by following this link: [Neighbourhood Plan | Salisbury City Council](#)
7. The Local Plan Inspector(s) is encouraged to view the SNDP documents in order to understand what the community of Salisbury wishes to see for its own future using the powers granted by the Neighbourhood Planning Regulation 2012 and the Localism Act 2011. The SNDP will become part of the Development Plan for Salisbury. It has reached a state where it had gained material weight in planning (NPPF 2023 para 48).
8. Having taken account of Planning Practice Guidance copied in the box below, SCC sought throughout to work cooperatively with the LPA. The steering group sought regular advice and also asked for regular meetings.

What is the relationship between the local plan and neighbourhood plans?

[Neighbourhood plans](#), when brought into force, become part of the statutory development plan for the area that they cover.

They can be developed before, after or in parallel with a local plan, but the law requires that they must be in general conformity with the strategic policies in the adopted local plan for the area (and any other strategic policies that form part of the statutory development plan where relevant, such as the London Plan). Neighbourhood plans are not tested against the policies in an emerging local plan although the reasoning and evidence informing the local plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.

There are requirements for a local planning authority to [support neighbourhood planning](#). Further detail is provided in the [neighbourhood planning guidance](#).

Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body. This could include sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals, and similarly for neighbourhood plans to acknowledge local plan policies that they relate to.

Paragraph: 006 Reference ID: 61-006-20190723

Revision date: 23 07 2019

9. The LPA failed to take a “proactive and positive approach, working collaboratively with the qualifying body.” This is explained in detail in the Consultation Statement and Basic Conditions Statement, but the more significant failures on the part of the LPA were:
 - a. A failure to agree the priorities for Salisbury.

- i. A draft statement of common ground was prepared but not agreed.
 - ii. There was no agreement about which policies would be “strategic” and therefore within the Local Plan, and which were “local” and therefore to be included in the SNDP.
 - iii. SCC’s submissions on the scope and content of the Place Shaping Priorities were ignored and not incorporated into the LPR in a meaningful manner. However, the SNDP vision was amended to account for the LPA’s place shaping priorities.
- b. A lack of consistency regarding the allocation of sites.
- i. Officers worked positively and proactively with SCC in preparing a methodology and approach towards SEA and a procedure was eventually agreed.
 - ii. WC (the property team) put forward sites in the Call for Sites at Brown Street Car Park and other locations. The SNDP then sought to allocate Brown Street, obtained funding for a neighbourhood development order and undertook extensive consultation. Despite this work, Wiltshire Council then objected to the allocation and SCC had no other choice but to remove the allocation because without landowner support, it would not be deliverable.
- c. A lack of consistency surrounding its own policies.
- i. Core Policy 20 identifies Churchfields as a future housing area. When the SNPD sought, through the Churchfields Masterplan prepared by AECOM, to advance residential uses in this part of the city and also to address matters of HGV impacts on the historic city centre and urban design, the LPA changed its approach and objected. This will be discussed below.
 - ii. The SNDP also sought to allocate land at Imery’s Quarry (also known as Quidhampton Quarry). The site could have yielded up to 400 homes. Though the landowner had proven through correspondence that the site could not be developed as an employment site, and that relevant minerals permissions had been addressed, the LPA maintained its objections on the grounds that a residential use would be contrary to policy. The LPR has now changed and the site is no longer identified as an employment site.
 - iii. The LPA’s objections to Quidhampton Quarry and Churchfields relied heavily upon their argument of SNDP policy conflict with the Minerals Core Strategy and the Waste Core Strategy. These documents are severely out of date and pre-date the NPPF. They should have been reviewed since their adoption and reviewed policies should have been included in the LPR. However, these policies have not been addressed and there is a policy vacuum across Wiltshire as a result.

10. Had the LPA engaged constructively with the SNDP and sought to overcome blockages, which were clearly resolvable, for instance by producing a parking study that had been promised in LPT3 that would have identified what was the current need for parking on city sites such as Brown Street Car Park, and taken a cooperative approach that sought problem-solving for matters around Quidhampton Quarry and Churchfields, the NDP could have yielded something in the order of 480 dwellings:
- a. Quidhampton Quarry: 400 homes, community centre and local community employment provision in a distinctive neighbourhood. This proposal had full landowner support. There were transport matters but the landowner was working constructively with all stakeholders and it is likely that a solution could have been agreed that would have unlocked this site.
 - b. Brown Street: A mixed use development of up to 50 dwellings with E Class Uses. The SNDP had been in discussion with the NHS who were active participants in the preparation of the SNDP and who were interested in using this site as a city-centre health facility that offered a range of community services. SCC had received a £50,000 grant from Locality to progress a Neighbourhood Development Order for this proposal and the design of the scheme was well underway. Following the landowner's objection (Wiltshire Council) the site was removed from the SNDP.
 - c. Churchfields: SNDP Policy 17 requires applicants to take full account of the Churchfields Masterplan which seeks a landowner-led approach to natural regeneration of Churchfields from a commercial area that causes severe traffic impact on the historic City Centre, to a mixed use area that contained appropriate forms of residential development such as live/work units and flats. The LPA maintains its objection to this approach. This will be discussed below. It cannot be stated how many houses Policy 17 might have yielded in the first 5 years of the LPR, but it would be safe to assume that a flat of 30 units might have been achievable. Overtime, the site could have yielded many more homes.
11. The LPA's stance has not been only contrary the guidance in PPG cited above, but also has resulted in the lost opportunity for at least 480 homes to be delivered through the SNDP in the next 5 years. Had the LPA approved, the Neighbourhood Development order for Brown Street would have been prepared alongside the SNDP and the city would have benefitted from a new high quality mixed use scheme that offered accessible health care and good quality affordable and market housing. The LPA could have worked alongside SCC to ensure that Churchfields would have evolved from the currently poorly-located industrial area that generates harmful HGV movements in the historic core into a vibrant new mixed use community where small businesses could start up and denser housing could have genuinely benefitted from the area's exceptional natural features whilst maximising opportunities for walking and cycling. A disused quarry could have become a new neighbourhood that offered a range of housing in a unique natural setting.

SCC's main reasons for objection with the Regulation 19 draft Wiltshire Local Plan

12. Throughout the preparation of the SNDP, SCC working with its own residents and with neighbouring parishes has sought to contain development within the city's developed area and to improve and enhance its outstanding historic and natural environment. Part of Salisbury's charm is its wider landscape setting with this green backdrop, rolling hills, Old Sarum, the views of the Spire, the exceptional greenspaces resulting from the confluence of rivers, most importantly the Avon which is a rare chalk stream and Special Area of Conservation in its own right.
13. The importance of Salisbury's green spaces and open hinterland cannot be overstated.
14. The Core Strategy allocated a number of greenfield sites for housing at Fuggglestone Red and Hampton Park. The Wiltshire Hosing Site Allocations Plan 2020 (WSHAP) allocated further greenfield sites for housing at Netherhampton Road, Hilltop Way, North of Netherhampton Road, Rowbarrow and Hampton Park. These greenfield proposals were offset by brownfield allocations at Churchfields and the Central Car Park (Maltings).
15. These allocations from the Core Strategy and WSHAP left Salisbury with a green margin so that the City's boundaries were generally still legible, except at Wilton. These developments have led to a notable increase in traffic on the local road system but primarily on the junctions of the A36 and A345 and the Harnham Gyratory in particular. The provisions of LTP3 have not been met and local people experience significant frustrating delays at all junctions. The failure of the junctions had led to unwanted impacts on the city centre as local traffic rat-runs across the city centre, thus creating additional traffic and air pollution in the AQMA over the city.
16. The LPR acknowledges that Salisbury is a constrained area that cannot take more greenfield development. The LPR text states:

4.120 The city of Salisbury is a Principal Settlement and a main focus for future growth. However, it is a constrained historic settlement. Significant development on the urban edge would threaten the city's setting and the settings to the Cathedral and Old Sarum Ancient Monument specifically. Areas around Salisbury are also rich in archaeological remains which have a strong likelihood to be of national importance. Opportunities to continue to expand are therefore limited. Longer term, Salisbury will not be able to accommodate the scales of growth it had in the past. As a result, the scale of growth is set lower than the previous development plan and comparable with actual rates that have been achieved. It is doubtful, however, that even this lower level can be maintained in the long-term.

4.127 Salisbury has become a constrained settlement in terms of what possibilities remain for its outward expansion. The city's setting and its heritage significance need to be protected. The Plan proposes a limited amount of further development on the city's periphery. Regeneration of the city's central area and guiding redevelopment are increasingly important as means to help meet development needs. Improving the use of current industrial sites is a part of this. An enhanced role for the Salisbury District Hospital is also an objective. Altogether change should limit additional burdens on the transport network and conserve the city's heritage assets.

17. The current Regulation 19 housing allocation proposals are located on land that will completely erode the green buffer between the City and Britford, contrary to LPR objectives, and will add pressure on the road network, particularly Harnham Gyratory.
18. The crux of SCCs objection to the policies and proposals in the LPR is that the current strategy is over-reliant on the use of greenfield sites and avoids the reuse of previously developed land in the City. Much of the land that could be redeveloped is under the control of Wiltshire Council. The main sites within Salisbury that Wiltshire Council owns and could provide housing on are:
 - a. The Central Car Park (Core Policy 20) – 200 dwellings
 - b. Churchfields (Household Waste Recycling Centre and depot) – 30 dwellings (with the potential for more)
 - c. Brown Street Car Park – 50 dwellings.
19. SCC sought to proactively promote previously developed sites so that greenfield sites would not be required. The City Council now objects that the LPR is proposing greenfield sites on third party land whilst not working with the City Council to reuse previously developed land in its ownership.
20. Furthermore, the City Council has drawn the conclusion that the reason for this greenfield-driven approach is money: the LPA can obtain funding from greenfield development to prop up its undelivered proposals for highways improvements that have arisen from the Core Strategy and are as yet unresolved, whereas it would face costs to develop its own land. The LPR therefore favours financial gain over the most effective use of land. This is illustrated in the Annex at the end of this document which copies tables from the review of the Infrastructure Delivery Plan. This shows that Wiltshire Council is relying almost entirely on developer contributions to fund previously programmed and future transport improvements in Salisbury.
- 21. The LPR approach with regard to Salisbury is therefore in conflict with the NPPF 2023 para 119 which states: “Strategic policies should set out a clear strategy for accommodating**

objectively assessed needs, in a way that makes as much use as possible of previously-developed or “brownfield” land.” Para 120c requires planning authorities to “give substantial weight to the value of using suitable brownfield land within settlements for homes...and to support appropriate opportunities to remediate despoiled, degraded, derelict and contaminated or unstable land”. Para. 121 requires LPAs to take a proactive role in identifying and helping bring forward land that may be suitable for meeting development needs including land held in public ownership using the full range of powers available to them.

The objectively assessed need for housing and commercial land in Salisbury

22. The emerging spatial strategy⁶ shows in Figure 23 that for the period 2020 – 2038, Salisbury’s overall housing requirement is 4,500 dwellings with a residual requirement of 1,530 and 12.3 ha of employment land.

The LPR approach to windfall contributions

23. The Housing Delivery Paper (2023) states in para 1.9 that the housing calculations make no provision from windfall sites. This is shown below:

1.9 Evidence shows larger windfall sites occur perhaps once or twice per settlement, if at all over a plan period, for example, by the redevelopment of large industrial sites. It is not possible to say that there will be a steady supply of opportunities, making an estimate based on past performance, and count on an allowance in the future. This is the case looking at a Main Settlement and also across the County as a whole. No explicit allowance for new homes is made from this source.

1.10 There is, however, strong evidence to show that there is a steady and predictable supply of new homes from windfall on small sites of less than ten dwellings at main settlements. Additional homes result from the conversion of buildings, sub-division and small-scale opportunities and redevelopment. Evidence gathered over the years of recording housing completions shows it is consistent and it can be calculated at a main settlement level. This supports the possibility of relying on an allowance for new homes from this source (set out in the chapter on windfall in the Housing Land Supply Statement³).

24. It would appear that windfall contributions are not being included except for small sites in the considerations of how much land is required.
25. Whatever methodology was utilised towards windfall contributions remains unclear. For Salisbury, the supporting documents to the LPR do not explicitly state how contributions from windfall (from small sites or large), how the Maltings Masterplan (which is a result of

⁶ Salisbury Housing Market Area Stages 1 and 2: Rolling Forward the Current Strategy and Alternative Development Strategies.

Core Policy 20) or how other sites such as Brown Street Car park might make a contribution. From the information provided, it is impossible to understand how the requirement for 1,530 for the Salisbury area has been arrived at.

26. In the preparation of the SNDP, SCC asked for and was provided with housing completions data for the Salisbury neighbourhood area. This data showed that for the calendar years 2016-2019 **579 dwellings were delivered on brownfield land in Salisbury for this five year period**. Over the same period, and following allocations in the Core Strategy, only 200 homes were delivered. Policy 22 expects only 350 dwellings to be delivered on brownfield land which is not justified in any of the background evidence and appears to be a low figure relative to past performance.
27. The Inspector is reminded that in Salisbury City, there were 579 dwellings delivered on brownfield sites. SCC did not obtain evidence of what was delivered in the remainder of the Salisbury area – it is surely more. The Regulation 18 consultation draft LPR contained a figure of 410 dwellings for the period 2021 - 2031 as brownfield target. The current Regulation 19 draft now expects 350 dwellings. The reasoning behind this change is not clear and simply does not make sense on the basis of past performance.
28. NPPF 2023 para. 71 states that “where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will supply a reliable source of supply.” Clearly, the past performance of windfall delivery plus the aborted site allocations in the SNDP in Salisbury is such compelling evidence.

The performance of proposed allocation sites in the Strategic Environmental Assessment

Alternative development strategies

29. A sustainability appraisal as part of a Strategic Environmental Assessment is a systematic process that must be carried out during the preparation of [local plans and spatial development strategies](#). Its role is to promote sustainable development by assessing the extent to which the emerging plan, **when judged against reasonable alternatives**, will help to achieve relevant environmental, economic and social objectives.
30. The SEA that accompanies the LPR does not consider **any** brownfield sites in Salisbury. It therefore fails to consider whether brownfield sites can be reasonable alternatives to greenfield sites. It therefore fails to meet the SEA regulations at the first hurdle.
31. The Sustainability Appraisal Report Annex 1.2 – Assessment of Alternative Development Strategies (September 2023) (the SA) notes that all alternative development strategy options are likely to have a moderate adverse effect on biodiversity. No brownfield sites have been assessed. It states

All strategies for Salisbury propose significant levels of growth which is likely to take place primarily on greenfield land due to a lack of PDL[previously developed land]. It is possible that development could avoid significant loss of BMV land and avoid the MSA areas. However, due to the scale of likely growth and problematic mitigation, moderate adverse effects are likely. (Options SA -A, B, C).

It is known that there is comparatively little scope for re-use of PDL in Salisbury

32. The final comment from this quote is clearly untrue and the validity of the SEA as an objective assessment of alternative is therefore open to question. No brownfield sites were included in the Strategic Environmental Assessment and therefore they were not considered as realistic options for housing provision.
33. However, the discussion above regarding sites that the SNDP sought to progress for housing on brownfield/PDL and the recent pattern of windfall allocations belies this assumption. There are brownfield sites in Salisbury that can be developed.
34. For the greenfield sites proposed for Salisbury, the SEA concluded the following (emphasis added):
 - a. *Biodiversity: Biodiversity issues in the Salisbury HMA are mainly focused on the Salisbury Plain SPA/SAC and SSSI and the River Avon SAC, which are likely to be a factor in decisions on any future development locations. This is particularly noteworthy in the Salisbury/Wilton area where the highest levels of growth are proposed, being the Principal Settlement – for this reason, **moderate adverse effects** are considered likely for all growth scenarios at Salisbury.*
 - b. *Water resources: All strategies propose a significant level of growth at Salisbury which has a number of water protection designations including Zone 1 SPZ and Drinking Water Safeguarding Zones. Salisbury is subject to planned future investment in water resources - Wessex Water have stated that they plan to invest in Salisbury to reduce phosphates and provide additional capacity between 2020 and 2025 - so there may be an opportunity to continue improvements to the water network. However, due to the scale of growth proposed, **moderate adverse effects** are considered likely.*
 - c. *Air quality: For all strategies **moderate adverse effects** are likely in Salisbury as mitigation will be problematic.*
 - d. *Flooding: The city is particularly at risk through fluvial flooding arising from the Avon and four other rivers that converge. Development may be able to take place without increasing flood risk but as site locations are not known, all strategies for Salisbury/Wilton are considered likely to have **moderate adverse effects** given the scale of growth proposed.*
 - e. *Historic environment: There are a significant number of heritage designations around Salisbury/Wilton which could be harmed by development. As no locations for development are known at this stage, the scale of growth for all strategies is considered likely to have **moderate adverse effects**.*

- f. *Landscape: There is potential for **significant adverse landscape effects** and harm to key views to/from Salisbury Cathedral and Old Sarum, depending on where new development is located.*
- g. *Transport: At this stage of appraisal it is difficult to make notable observations on the precise suitability of access along with the impacts on local transport capacity. More detailed assessment may be possible at the site assessment stage where impacts along with mitigation/improvement measures may become clearer. **Salisbury hosts a number of key routes, all passing through or around the centre. These routes, namely the A36, A345 and A30 each suffer from peak time delays at key junctions. This congestion also needs to be considered against its impact on the AQMA present within Salisbury. All strategies propose a level of growth to Salisbury that is likely to exacerbate existing transport issues in the city, whether below or above current WCS requirement. The Salisbury Transport Strategy was refreshed recently for the WHSAP and may need to be looked at again if mitigation measures are going to reduce the level of impacts. For all strategies, moderate adverse effects are considered likely (emphasis added).***

35. The SEA shows that all greenfield proposals would have a negative effect on many of the key features of Salisbury that create its character and residents' quality of life. The positive outcomes of additional homes and more affordable homes could be met on brownfield sites so the decision on green/brownfield sites is neutral for those criteria.

SEA of individual sites proposed in Salisbury

36. SA Annex 2.11 - Salisbury HMA: Salisbury Sites Assessment considers the two greenfield sites proposed for Salisbury:

- a. Land to the north of Downton Road
- b. Land adjacent to A354, south of Harnham

37. The SEA concluded for land north of Downton Road (emphasis added):

- a. *Water - Investigations and agreement with Wessex Water's regulators and mitigation measures are likely to be implemented over a long lead in time (~10 years). Significant development in the Salisbury area is likely to trigger the need for new mains and service reservoirs to transport potable water from elsewhere within Wessex Water's network to satisfy demand. **It is unlikely that Wessex Water would be able to provide available capacity before 2030.***
- b. *Air quality: Salisbury has **three Air Quality Management Areas (AQMAs)** in respect of the nitrogen dioxide annual mean objective. Exceedances exist on A36, A30 and at several hotspots in the city centre. Significant traffic management measures are needed to remove levels of traffic from the A36 in particular. If site allocations are made in the LPR, CIL/S106 contributions will be required to enable the council to take actions to enable the revocation of the AQMAs. This site connects with the Harnham Gyratory which is congested, and further development has the potential to worsen this situation. **A wider view is required of the network capacity and the effects this***

will have on air quality on Downton Road, and in particular on Harnham Road. The cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAs needs to be modelled and assessed.

- c. *Landscape: The site contributes to a sense of separation between the suburban edge of Salisbury and the rural, low-density, linear village of Britford to the east. It forms part of the river valley setting and the rural approach to Salisbury from the southeast, across which there are clear views of Salisbury Cathedral. The site forms part of a locally distinctive water meadows landscape. There is high scenic quality and value associated with the river landscape, although this is reduced within the site. The site and adjoining landscape is in generally good to moderate condition with few intrusive elements. **Overall, it is considered that the site is of generally medium landscape sensitivity to development, with higher sensitivity to the north and east of the site due its contribution to the rural approach to Salisbury and historic water meadow landscape.** The site has generally medium capacity to accommodate development.*
 - d. *Traffic: Delivery of Salisbury Transport Strategy with a focus on Harnham Gyratory and strategic footway/cycleway links.*
38. The conclusions that can be drawn from this is that the site provides an important green buffer separating Salisbury from Britford (which both parishes wish to preserve), that the proposals of the development will require significant highways improvements based on the Salisbury Transport Strategy (which is part of LTP 3 and therefore linked to the Core Strategy) and that there will be negative impacts on air quality. Whether brownfield development in Salisbury could have performed better has not been considered.
39. The SEA concluded that for land adjacent to A354, south of Harnham (but this is also relevant for land west of Coombe Road which is outside the City):
- a. *Biodiversity: **The location has implications for designated sites.** There will be a need to offset in-combination effects of recreational pressure on the two local County Wildlife Sites (CWS). Lime Kiln Chalk CWS, a publicly accessible grassland site partly owned by Salisbury City Council, lies immediately adjacent to the site. Harnham Slope CWS would also be vulnerable to increased recreational pressure as it lies 600m away and can be accessed directly by a public right of way. The location has implications for designated sites. There will be a need to offset in-combination effects of recreational pressure on the two local County Wildlife Sites (CWS).*
 - b. *Water: The area covered by Wessex Water has been classed by the Environment Agency as 'seriously water stressed'. Significant new development in Salisbury would require investigations and agreement with Wessex Water's regulators and mitigation measures are likely to take time, and **unlikely to deliver capacity before 2030.***
 - c. *Air Quality: Salisbury has three Air Quality Management Areas (AQMAs) in respect of the nitrogen dioxide annual mean objective. Exceedances exist on A36, A30 and at several hotspots in the city centre. Significant traffic management measures are needed to remove levels of traffic from the A36 in particular. If site allocations are*

*made in the LPR, CIL/S106 contributions will be required to enable the council to take actions to enable the revocation of the AQMAs. **This site connects with the Harnham Gyrotory which is congested, and further development has the potential to worsen this situation. A wider view is required of the network capacity and the effects this will have on air quality on Downton Road, and in particular on Harnham Road. The cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAs needs to be modelled and assessed.***

- d. *Traffic: This site connects with **the Harnham Gyrotory** which is congested, and further development has the potential to worsen this situation.*
- e. *Historic environment: **The site is close to Scheduled Monument Woodbury hillfort and settlement and the contribution to the setting requires further assessment. Site likely to have archaeological interest. Contribution to significance requires assessment before potential for mitigation or impact on capacity can be considered.** The site is within the 100m buffer of Scheduled Monument - Woodbury Ancient Villages (NHL: 1005652). The site spreads into the eastern buffer area which is of high value. There are several high value features on site, including a series of late prehistoric to Roman ditches spreading into the eastern site area, possibly associated with the Iron Age hillfort and hundreds of undated pits (medium to high value). The site is within the 100m buffer of Bronze Age round barrow and an early Bronze Age cremation burial site ring ditch. Following further investigation, mitigation could include avoidance of high value archaeological remains where preservation in situ is likely to be required, particularly in the eastern area of the site. Should preservation be part of a mitigation strategy, opportunities to interpret and enhance understanding and / or improve land management regimes could be taken forward. Also, in the western site area, mitigation strategy could include preservation by record where preservation in situ is not required. Consider opportunities to enhance the understanding and setting of the Scheduled Monuments.*
- f. *Traffic: **Necessary Strategic Mitigation Delivery of Salisbury Transport Strategy, with a focus on walking and cycling links and enhancements to Harnham Gyrotory.***
- g. ***The Town Centre and Railway Station are approximately 3000m from the site and thus too far to walk.** With regards to cycling, significant gradients present a barrier along with steps serving the public right of way network, however the distances are traversable.*

40. The conclusions that can be drawn from this is that these sites pose a number of problems that could be mitigated but it would be preferable to avoid if there were alternative sites. The main impacts are from additional traffic, on the historic and natural environment and on air quality. Whether brownfield development in Salisbury could have performed better has not been considered.

Economic development and Churchfields

41. The Wiltshire Employment Plan Review Update September 2023 considers Salisbury within the A303 FEMA.

Salisbury	<p>The Wholesale & Retail Trade¹⁷ sector is the largest sector in employment terms in Salisbury. There has been no growth in employment in sectors that influence demand for industrial space over the period analysed. The Professional, Scientific & Technical Activities sector has seen the highest job growth of all sectors in Salisbury. The Financial & Insurance and Information & Communication sectors saw the largest decline in jobs over the period, but Financial Services remains a significant presence.</p> <p>Investments at Churchfields include Nicholas & Harris' factory expansion. Eight small units have been built at Long Hedge, all of which sold off plan.</p> <p>Some central large footplate office space has been lost to residential conversion. Local businesses report difficulty finding suitable sites/ premises to accommodate growth in the area.</p> <p>High Post Trading Estate (which lies approximately 4.5 miles to the north of Salisbury) is again fully occupied, and investments at Churchfields include Nicholas & Harris' factory expansion. Eight small units have been built at Long Hedge, all of which sold off plan. There is a scarcity of allocated employment land around Salisbury to accommodate business growth.</p> <p>At Wilton, Wholesale & Retail Trade is one of the largest employers in absolute terms, as well as Manufacturing. Over the period the Administrative and Support Service Activities sector saw the highest employment growth in the area with all other office-based sectors seeing declining employment.</p> <p>To the northeast of Salisbury, there is the Porton Down is home to a globally significant defence/life sciences presence with occupiers including military science park, whose occupiers include the Defence Science Technology Laboratory (DSTL Dstl), UK Health Protection Security Agency (UKHSPA), Porton Science Park and Porton Biopharma. Life sciences and defence-related investments in the area remain strong, with full occupancy of Phase One of the Porton Science Park achieved in May 2021 and Phase 2 recently completed.</p>
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42. A number of conclusions can be drawn. First, it is apparent that there is demand for additional employment land but that only one major scheme came forward in Churchfields. High Post estate 4.5 miles from Salisbury is nearly fully occupied. It has only recently opened and was sold out in 2018. Porton Down is the growing science and technology hub for the area. Demand for office space is down but stable.
43. Within the A303 FEMA, Figure 3.1 shows that market signals were as set out below. It is noteworthy that there is a demand for smaller units and a lack of supply of smaller units. In addition, Persimmon Homes appear to be holding back land at Fugglestone Red and Old Sarum that is allocated for economic development on the grounds that there is no demand

for employment land.

Figure 3.1: Market Signals

FEMA and sector	Commentary
A303/ Salisbury FEMA industrial	Take-up fell in 2020 but started to recover in 2021. 85% of transactions have been for units of less than 5,000 sq. ft (460 sq. m). Rental levels have seen some, but limited, growth over the period, driven by the lack of supply of small units. Overall availability in the market exceeds two years of take-up ²³ , but there is limited availability of properties of less than 10,000 sq. ft (930 sq. m). All the available premises are of adequate quality. Warehousing and distribution premises tend to be smaller than those located close to the M4.
A303/ Salisbury FEMA offices	Take-up of office space did not dip in 2020 but may have fallen in 2021. Over 80% of take-up is for units of less than 200 sq. m and 93% in units of less than 500 sq. m. Rental levels have declined over the period from 2016, but with some leveling out since 2019. There is just over two years of supply available, but the supply of units of less than 300 sq. m is more limited.

44. There is also a demand for larger units (para. 3.5.1) for industrial activities but where this should be ideally provided has not been explained. In any event, SCC consider that it would not be appropriate to allow for large industrial activities in Churchfields particularly where they would generate any form of traffic with a concomitant impact on the historic city centre. Para 3.5.4 indicates that more land is needed in places around major towns such as Chippenham, Melksham and Westbury where there is good access to the strategic road network. Consultees to the economic land study did not indicate that they wished to have industrial sites and larger units in Salisbury.
45. The economic study also notes that land currently allocated for employment use has not come onto the market at: Fugglestone Red (Core Strategy), Old Sarum and Imerys Quarry (Quidhampton Quarry). Figure 6.5 of the study indicates that the landowner at Fugglestone Red appears to resist delivery of economic development on this mainly residential site. Land at High Post could provide additional employment land for Salisbury as could land at the District Hospital (outside the SNDP area).
46. Churchfields does not compare favourably with these sites. The report states:

Churchfields	Salisbury	-	Employment	Existing employment site	n/a	n/a	Churchfield's estate is currently acting as an important and established business park in Salisbury but is not without its challenges. Its location is not suitable for HGV lorries and heavy industrial uses due to the narrow roads and heavy traffic through the city centre. Lack of designated parking is an issue too. However, the full occupancy of the estate suggests it
							is performing as a successful employment area. The fragmented land ownership is a significant constraint in terms of gaining a collective willingness to bring forward a large-scale site improvement programme and impacts viability through land assembly costs. An estate regeneration plan should be developed to implement improvements.

47. This commentary illustrates that Churchfields does not compare favourably to other sites, albeit that they are greenfield, because of traffic impact and fragmented land ownership. It also notes that a estate regeneration plan would be required.

48. Appendix 5 of the employment land review shows that land is available to meet the FEMA's needs that do not include adding additional traffic in Salisbury's historic core (as would Churchfields):

- a. Fugglestone Red (allocated)
- b. Old Sarum (allocated)
- c. IKLF site, Wilton (allocated)
- d. High Post
- e. Salisbury District Hospital.

49. The continued use of Churchfields as an enhanced employment site proposed the following interventions:

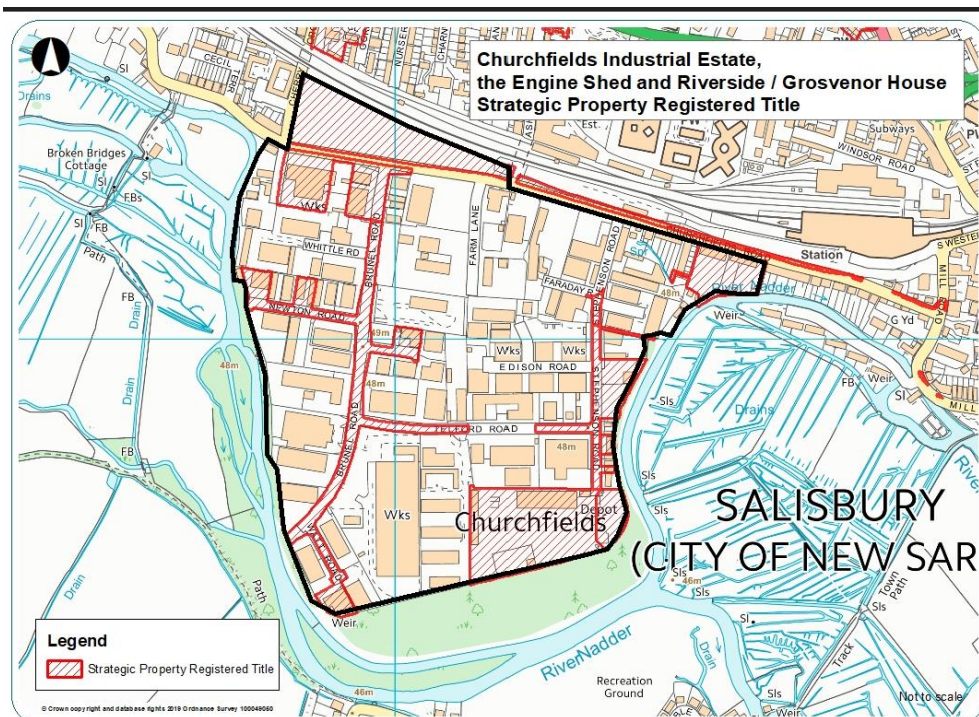
It would be appropriate to develop an estate regeneration plan to implement improvements. Such improvements could vary in scale, and recommendations include:

- The Council in conjunction with the development of an estate regeneration plan engages with local businesses at Churchfields around their business growth plans and needs, especially those occupying lower quality industrial stock and those with HGV requirements. This can help tailor what buildings/plots could be used for alternative uses.
- Engage and co-develop a relocation plan with businesses interested in moving elsewhere in Salisbury.
- This would form a cohesive land assembly strategy.

50. The reference to the need for an estate regeneration plan causes great concern to SCC. Core Policy 20 required a masterplan to be produced for Churchfields. This was never done. Wiltshire Council has never engaged with local businesses at Churchfields to bring about any manner of change and Wiltshire Council has already, in numerous emails and letters, made it clear that it would not produce a relocation plan. If the provisions of the Core Strategy have never been delivered, the City Council is concerned that the proposed engagement strategy will not be done either. The SNDP on the other hand has undertaken engagement on the

future of Churchfields and has produced a masterplan for its improvement and regeneration.

51. SCC concludes that there are alternatives to meet a changing economy and that Churchfields, though it serves a local economic function for Salisbury residents, is probably not the best place to encourage increased growth. Its function should be to provide for Salisbury not the wider FEMA and new sites that can be adapted to modern expectations would be preferable to deliver wider economic growth. Overall estate regeneration should be provided by SNDP policy 17 and the Churchfields Masterplan.
52. A key consideration of the future of Churchfields is that a significant element of the land there is owned by Wiltshire Council. The map below shows WC ownership:



53. The largest land parcel is used by the household recycling site and the depot to the south east. This land is also overlooking some of the most beautiful and tranquil views of any part of Salisbury with unrestricted views of the cathedral and the water meadows. The River Nadder runs to the south. This site would be ideal as a residential area, albeit it has constraints such as contamination and previous development, but if Wiltshire Council were to use the full range of powers available to them (as set out in NPPF 2023 para 121) then these issues could be overcome. The result would be a new residential area with a high quality environment within walking distance of the railway station and the town centre. It would also result in the removal of waste-related HGV traffic through the historic town centre.
54. These innovations and the reuse of brownfield land were at the heart of SNDP policy 17 and the Churchfields Masterplan. SCC will continue to defend policy 17 to ensure that it is made.
55. The full argument about Churchfields and the reasons for not relocating the recycling site, and for not reviewing Wiltshire's waste policies in general, is explained in more detail in the

Basic Conditions Statement, the Consultation Statement, the SNDP and the Churchfields Masterplan and cannot be repeated here.

56. The Infrastructure Delivery Plan 2023 (IDP) Appendix 1 shows that Wiltshire Council are indeed planning to relocate the recycling centre (though this information has not been shared with SCC despite many requests). When this is done, the Churchfields Masterplan can begin to be realised. A recent Cabinet Paper on the waste depot strategy shows that there are plans to relocate the Salisbury Household Waste Recycling Depot: [Depot Plan.pdf \(wiltshire.gov.uk\)](#).

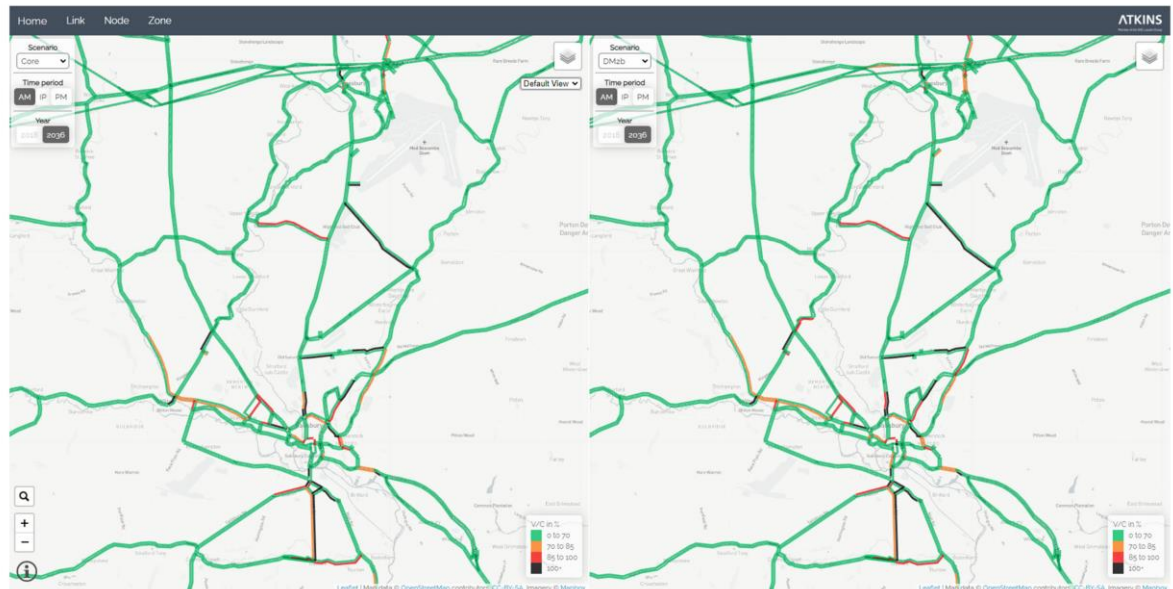
Salisbury	Waste Management	Revelopment/ relocation of Salisbury Household Recycling Centre	To reduce queues and improve access. Scale of future development suggests that a larger site will be required over the Plan period.	2023-2038	Wiltshire Council; Private contractors	0.774	0.000	Developer contributions; Wiltshire Council
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Transport implications of proposed site allocations

57. The SEA indicated that growth in Salisbury would have traffic impacts on an already strained network. The LPR housing evidence gave assurances that traffic impacts had been taken into account and referred to the Transport Evidence Base Review, May 2023.
58. This transport review was based on modelling that specifically does not assess local impacts around development location (see para. 2.4.3). One study of the Harnham gyratory did not do a traffic count on Netherhampton Road, one of the main feeder roads onto the junction.
59. Link capacity was shown below to be congested (section 3.5): The proposed allocation will increase traffic to reach 97% capacity.

- **Salisbury and Amesbury** - The A338 southbound at St Thomas' Bridge Roundabout, the A36 southeast of Salisbury, and Porton Road through Amesbury. Notably the A354 approach to Harnham Junction has shown an increase in V/C from 85% to 97%. Note - the change on the A345 Castle Road reflects growth previously expected in High Post which has since been removed from the 2022 Local Plan Review housing allocations.

Figure 3-11 - Salisbury and Amesbury V/C% - 2038 Scenario 1 (AM peak)



60. The review indicated that key measures from the Salisbury Transport Strategy were more than likely to be implemented by 2026. These include the Harnham Gyratory remodelling and Exeter Street roundabout enhancements, St Marks Roundabout and Park Wall junction. Other matters were reasonably foreseeable (St Pauls Roundabout enhancements and the development of a hierarchy of routes that restrict traffic movements in the city) and others that were hypothetical (College Roundabout enhancements, Bourne Way enhancements).
61. SCC's concern is that all the projects listed in the previous paragraph should have been delivered by the Core Strategy and LTP3 and they have not. As a result, as shown in the capacity flow diagrams above, some parts of the local road network are very congested or at standstill. If the last set of highways mitigation provision for the last set of allocations have not been delivered, how can it be possible to add more strain to the network through more allocations, thus making a bad situation worse? There is uncertainty about whether even the limited improvements to one arm of the Harnham gyratory are viable, according to a WC presentation to SCC in a recent presentation, though this is not referred to in any of the supporting evidence to the LPR.
62. What is lacking from the transport review is a parking study and the future use of parking infrastructure owned by Wiltshire Council. The parking study was part of LTP3 and it was meant to assess why the park and ride system was not being taken up and how much of the city's parking spaces were unused or redundant. The lack of a parking strategy was raised as the main objection by Wiltshire Council to the allocation of Brown Street Car Park as a residential site as proposed in the Core Strategy and the Central Area Framework. SCC is therefore perplexed and concerned that this important parking study has not been considered in the transport review and hopes that it might be included in LTP4. It is not mentioned in the reviewed Infrastructure Delivery Plan as a project.

63. The local plan review should have been prepared against up to date transport evidence. LTP 3 has clearly been used in the preparation of the local plan policies but is now significantly out of date. A better and more robust transport assessment than the one presented in the LPR supporting evidence would have been more appropriate and accurate.
64. Current evidence provided in support of the LPR does not give adequate consideration of potential transport impacts. The LPR should be supported by an up to date Transport Plan, LTP4.

Review and Update of the Infrastructure Delivery Plan September 2023 Version 0.4

65. The IDP is also an update of the 2016 IDP. It identifies costly infrastructure improvements for Salisbury including:
- a. A338 Southern Salisbury Junction improvements
 - b. 80 place nursery
 - c. New integrated care centre (not part of the hospital)
66. Appendix 1 of the IDP review shows key infrastructure requirements for Salisbury, many of them with very concerning shortfalls. These are shown in the Annex below. What this annex shows is that there are very significant shortfalls in funding that are meant to be delivered by developer contributions. The most notable of these is the A338 southern Salisbury Junction improvements (Exeter Street Roundabout, Harnham Gyrotory and Park Wall Junction). These are shown in the transport review to be likely to be implemented by 2026, yet the IDP shows that the estimated cost of £17,495,000 is woefully short of the secured funding of £1,552,000. The IDP states that this funding will be secured from developer contributions.
67. SCC is concerned that the outstanding £15,943,000 for this one major project cannot be secured through developer contributions from the LPR proposed allocations and still be compliant with para. 57 of the NPPF.
68. However, the alternative proposed by SCC in the SNDP and here, that brownfield land should be prioritised is also problematic. If Wiltshire Council owns much of the brownfield land in question (Brown Street Car Park, The Maltings/Central Area, the Household Recycling site in Churchfields for instance) then Wiltshire Council would be paying developer contributions to itself.
69. For SCC, the reasoning behind the preference for greenfield sites that will cause harm according to the SEA and that will give rise to traffic impacts that are already, in some places, intolerable, rendering the road system to be no longer functional with increased air quality impact and an increase of HGV and other commercial traffic in the historic core of the city, is because Wiltshire Council needs money from greenfield sites to pay for its unsupported LTP3 projects.

Conclusion

70. National policy (NPPF 2023 para 35) requires LPA's to prepare plans that are sound because they are:

- a. **Positively prepared:** providing a strategy that is consistent with achieving sustainable development. However, SCC is concerned that the plan has not been prepared with a view to delivering sustainable development as shown by the SEA which
 - i. does not consider all alternatives (such as the contribution that can be made to meet identified need on brownfield land),
 - ii. ignores that some of the options chosen will increase environmental impacts (such as the harm to Salisbury's setting and the gaps between settlements which protect local character or the intensification of commercial activity in Churchfields),
 - iii. that some of the proposed mitigation is uncertain (for instance that air quality will be managed or that there will be enough money to pay for necessary transport improvements), and
 - iv. is not based on up to date evidence, for instance the Maltings Masterplan has proven to be undeliverable but has not been updated.
- b. **Justified:** The approach did not take account of reasonable alternatives such as the proposals put forward in the SNDP for the use of brownfield land to meet housing requirements, or more generally to consider brownfield land (especially under Wiltshire Council's ownership) as an alternative to greenfield sites.
- c. **Effective:** Some of the assumptions such as the provisions of LPT3 have not been delivered and the new delivery requirements are subject to question since there appears to be no means of paying for the projects. Other matters such as the proposed "improvements" to Churchfields which will rely on the production of an estate management plan are also questionable since the masterplan promised in the Core Strategy for the same area was never produced.
- d. **Consistent with national policy:** The allocations on greenfield land in Salisbury is contrary to the provisions of NPPF 2023 and does not promote the effective use of land in meeting the need for home sand other uses.

71. This argument is set out to assist the Inspector(s) to understand SCC's concerns regarding the overall approach to planning for Salisbury. Individual policy responses have been set out separately.

Annex: Review and Update of the Infrastructure Delivery Plan Version 0.4

Wiltshire Infrastructure Delivery Plan - Appendix 1

September 2023

Location	Category	Project	Rationale	Timescale	Potential Delivery Agents	Funding (£m)		
						Cost	Secured	Potential Source(s)
Salisbury	Transport	A338 Southern Salisbury Junction improvements (Exeter Street Roundabout, Harnham Gyratory and Park Wall Junction)	Salisbury Transport Strategy - highways	2023-2028	Wiltshire Council	17.495	1.552	Developer contributions
Salisbury	Transport	St Paul's highways Improvement scheme (capital)	Salisbury Transport Strategy - highways	2023-2028	Wiltshire Council	0.553	0.000	Developer contributions; Wiltshire Council
Salisbury	Transport	Harnham highways improvements	Salisbury Transport Strategy - highways	2023-2028	Wiltshire Council	1.441	0.000	Developer contributions; Wiltshire Council
Salisbury	Transport	Exeter Street highways improvements	Salisbury Transport Strategy - highways	2023-2028	Wiltshire Council	1.290	0.000	Developer contributions; Wiltshire Council
Salisbury	Transport	Park and ride scheme (revenue at £300K p.a.)	Salisbury Transport Strategy - highways - park & ride	2023-2028	Wiltshire Council; Public Transport Operator(s)	3.412	0.000	Developer contributions; Wiltshire Council
Salisbury	Transport	Buses (revenue at £700K p.a.)	Salisbury Transport Strategy - highways - public transport	2023-2028	Wiltshire Council	7.962	0.000	Developer contributions; Wiltshire Council
Salisbury	Transport	Intelligent Transport Systems (ITS) (capital)	Salisbury Transport Strategy - highways - demand management	2023-2028	Wiltshire Council	0.542	0.000	Developer contributions; Wiltshire Council
Salisbury	Transport	Walking and cycling measures	Salisbury Transport Strategy - highways - walking and cycling	2023-2038	Wiltshire Council	1.680	0.000	Developer contributions; Wiltshire Council

Salisbury	Transport	Smarter choices promotion	Salisbury Transport Strategy - highways - smarter choices	2023-2038	Wiltshire Council	2.438	0.000	Developer contributions; Wiltshire Council
Salisbury	Transport	A36 Southampton Road upgrades (inc. road widening, increasing roundabout capacity and bus priority lanes).	Reduce delay and congestion; improve A36 gateway to city.	2023-2038	Wiltshire Council; Highways England	6.000	0.000	Developer contributions; Local Growth Fund; Highways England funding
Salisbury	Electricity (SSE)	Enhancements to the electricity network to improve energy generation	To enable new generators to connect to the grid. The energy generation infrastructure is partially constrained in and around Salisbury.	2023-2028	Scottish and Southern Electricity	0.000	0.000	Scottish and Southern Electricity
Salisbury	Education	Additional 233 early years places	80 place nursery opened at Old Sarum in January 2023. Netherhampton Road Primary School will provide 30 places. Further need for a new 80 place nursery in the Harnham area.	2023-2038	Wiltshire Council; Private provider; Local schools	5.325	0.000	Developer contributions
Salisbury	Education	Additional 560 primary school places	Financial contributions would be required for new primary places from all developments.	2023-2038	Wiltshire Council	12.500	0.000	Developer contributions
Salisbury	Education	Additional 395 secondary school places	Surplus places in one school but a significant expansion of Sarum Academy will be required.	2023-2038	Wiltshire Council	11.060	0.000	Developer contributions
Salisbury	Air Quality	Provision of air quality monitoring infrastructure (City Centre, Wilton and London Road AQMAs)	Strategic monitoring of air quality in the AQMAs, e.g. nitrogen dioxide emissions, source apportionment, action plan and strategic measures.	2023-2038	Wiltshire Council	0.156	0.045	Developer contributions; Wiltshire Council
River Avon SAC	Environment	Nutrient Management Plan	To make phosphate neutral development with no adverse impact on the River Avon Special Area of Conservation.	2023-2038	Wiltshire Council, NE, EA and Developers	0.000	0.850	Developer contributions; Wiltshire Council
Salisbury	Waste Management	Revelopment/ relocation of Salisbury Household Recycling Centre	To reduce queues and improve access. Scale of future development suggests that a larger site will be required over the Plan period.	2023-2038	Wiltshire Council; Private contractors	0.774	0.000	Developer contributions; Wiltshire Council
Salisbury	Drainage and wastewater	Review and provide capacity at Salisbury Water Recycling Centre (WRC)	To support planned development and consider effects of climate change.	2023-2028	Wessex Water	0.000	0.000	Wessex Water
Salisbury	Leisure Facilities	Upgrades to sport and recreation facilities within Five Rivers Health and Wellbeing Centre - upgrade pool, flumes etc.	Income generation	2023-2038	Wiltshire Council	0.000	0.000	Developer contributions; Football Foundation
Salisbury	Leisure Facilities	Development of a second 3GATP	Identified in the current Wiltshire Playing Pitch Strategy (PPS)	2023-2028	Salisbury Town Council	1.000	0.000	Developer contributions; Football Foundation

Devizes and Salisbury	Arts and Heritage	Salisbury and Wiltshire Heritage Museums	To provide additional storage space for archaeological finds during new development.	2023-2038	Wiltshire Council	1.300	0.200	Developer contributions; Wiltshire Council
Salisbury	Libraries	New internal and external signage	To ensure new people to the area are aware of the library location and able to navigate the services within the building.	2023-2033	Wiltshire Council	0.006	0.000	Developer contributions
Salisbury	Libraries	Book collections	To support the needs of new residents. Areas where demand exceeds core book funding, e.g. children, employment support and health and wellbeing.	2023-2033	Wiltshire Council	0.010	0.000	Developer contributions
Salisbury	Libraries	New build/ refurbishment	Improve the overall visitor experience to accommodate the increase in population from local developments.	2023-2033	Wiltshire Council	0.100	0.000	Developer contributions; Wiltshire Council
Salisbury	Police	New Police Station and site	Bourne Hill site will not meet future needs of police. Relocation to new site of 1.5 acre within 5 miles of Salisbury City Centre required.	2023-2033	Wiltshire Police; Police and Crime Commissioner for Wiltshire & Swindon	0.000	0.000	Wiltshire Police; Police and Crime Commissioner for Wiltshire & Swindon

Wiltshire Infrastructure Delivery Plan - Appendix 1u: CIL Infrastructure List (May 2023)

September 2023

Location	Category	Project	Rationale	Timescale	Delivery	Funding (£m)		
						Cost	Secured	Potential Source(s)
Salisbury	Transport	A338 Southern Salisbury Junction improvements (Exeter Street Roundabout, Harnham Gyratory and Park Wall Junction)	Salisbury Transport Strategy - highways	2023-2028	Wiltshire Council	17.495	1.552	Developer contributions
River Avon SAC	Environment	Nutrient Management Plan	To make phosphate neutral development with no adverse impact on the River Avon Special Area of Conservation.	2023-2038	Wiltshire Council; Natural England; Environment Agency; Developers	0.000	0.850	Developer contributions; Wiltshire Council
Salisbury	Environmental Protection	Provision of air quality monitoring infrastructure	Strategic monitoring of air quality in the three AQMAs (City Centre, Wilton Road and London Road AQMAs).	2023-2038	Wiltshire Council	0.156	0.045	Developer contributions; Wiltshire Council

Salisbury	Leisure Facilities	Upgrades to sport and recreation facilities within Five Rivers Health and Wellbeing Centre	To meet an identified need in the Indoor Facilities and Playing Pitch strategies. Upgrade swimming pool, e.g. flumes etc.	2023-2038	Wiltshire Council	0.000	0.000	Developer contributions; Wiltshire Council
Devizes and Salisbury	Arts and Heritage	Salisbury and Wiltshire Heritage Museums	To provide additional storage space for archaeological finds during new development.	2023-2033	Wiltshire Council	1.300	0.200	Developer contributions; Wiltshire Council
Salisbury	Libraries	New internal and external signage	To ensure new people to the area are aware of the library location and able to navigate the services within the building.	2023-2033	Wiltshire Council	0.006	0.000	Developer contributions
Salisbury	Libraries	Book collections	To support the needs of new residents. Areas where demand exceeds core book funding, e.g. children, employment support and health and wellbeing.	2023-2033	Wiltshire Council	0.010	0.000	Developer contributions
Salisbury	Libraries	New build/ refurbishment	Improve the overall visitor experience to accommodate the increase in population from local developments.	2023-2033	Wiltshire Council	0.100	0.000	Developer contributions; Wiltshire Council