Consultation Statement

Salisbury Neighbourhood Development

Plan 2020-2038 (NDP)

This consultation statement is set out in four separate documents:

Part 1: Introduction and initial consultation

(a)contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified;

(b)explains how they were consulted;

Part 2: Regulation 14 Consultation

(a)contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified;

(b)explains how they were consulted;

Part 3: Responses to Regulation 14 Consultation

(c)summarises the main issues and concerns raised by the persons consulted; and

(d)describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified.

Part 4: Revised NDP tracked changes showing final modified text

(d)addressed in the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified.



PART 1: INTRODUCTION AND INITIAL CONSULTATION

Preface: The purpose of the Consultation Statement

The statutory requirement of the Consultation Statement will only be described here, in Part 1.

This Consultation Statement has been prepared in support of the NDP on behalf of Salisbury City Council ("the qualifying body") as part of its submission to Wiltshire Council as the Local Planning Authority (LPA) to meet the requirements of the neighbourhood planning regulations.

Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 and modifications in The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2017 the requires:

Plan proposals and modification proposals]

15.—(1) Where a qualifying body submits a plan proposal or a modification proposal to the local planning authority, it must include—

(a)a map or statement which identifies the area to which the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified relates;

(b)a consultation statement;

(c)the proposed neighbourhood development plan;

(d)a statement explaining how the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act or in the case of a modification proposal, how the neighbourhood development plan as proposed to be modified meets the requirements of paragraph 11 of Schedule A2 to the 2004 Act

(i)an environmental report prepared in accordance with paragraphs (2) and (3) of regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004; or

(ii)where it has been determined under regulation 9(1) of those Regulations that the plan proposal or the modification proposal is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), a statement of reasons for the determination, and

(f)in relation to a modification proposal, a statement setting out the whether or not the qualifying body consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the qualifying body is of this opinion.]

(2) In this regulation "consultation statement" means a document which—



(a)contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified;

(b)explains how they were consulted;

(c)summarises the main issues and concerns raised by the persons consulted; and

(d)describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified.

This document (the sum of Parts 1-4) meets the requirements of Regulation 15 (1b) and (2).

The level of correspondence is substantial and the discussion of this in addition to the responses to Regulation 14 would be more than could be included in a single document. Therefore, this Consultation Statement is split into four documents:

- Part 1 discusses the consultation that led to the final draft NDP that was consulted upon at Regulation 14.
- Part 2 explains how the Regulation 14 consultation was undertaken and presents the full responses received. This Part 2 document meets the requirements of (2)(a) and (2)(b) of Regulation 15.
- Part 3 analyses the responses by policy/topic based on the responses shown in Part 2.
- Part 4 shows the changes to the Regulation 14 draft NDP text to make clear where the Regulation 14 draft and the submission Regulation 15 draft differ.



Introduction

The Salisbury Neighbourhood Development Plan 2020 – 2036 (NDP) has been in preparation since early 2018, which is a period of 4.5 years, to reach the end of Regulation 14 consultation. The steering group composed of City Councillors and members of the Salisbury community has worked extremely hard to prepare what is a complex and ambitious plan in the face of policy uncertainty.

The Wiltshire Core Strategy was prepared after the 4 Districts of Wiltshire joined into a unitary authority in 2009. The Core Strategy is substantially a unification of the 4 district plans and as a result contains many policies carried over from the districts, in this case, Salisbury District Council.

The NDP was prepared in the aftermath of the damage caused by the "Salisbury poisonings" which led to a significant fall in visitors and a perceived decline in the City's fortunes. The City Council joined forces with Wiltshire Council to prepare a recovery strategy but the City Council wanted to do more than be led by Wiltshire Council, and it decided that in addition to working with Wiltshire Council, it would prepare its own neighbourhood plan to enable the community to have a say over its own future.

Though the steering group tried at every juncture to work cooperatively with Wiltshire Council (WC) as the local planning authority (LPA), there were concerns raised by the NDP should avoid site allocations on sites that were included in the Core Strategy. The steering group did not agree with WC's interpretation of the role of neighbourhood plans and pursued site allocations in the face of WC's opposition. This was done because at the same time that the NDP was in preparation, WC issued its Regulation 18 Local Plan review documents which proposed allocation of new greenfield sites at the edge of Salisbury. The City Council and neighbouring Britford Parish Council strongly opposed the use of this greenfield site (Site 6 which is retained in the Regulation 18 local plan review) which also served as a green buffer between the parishes. WC's own policy objectives sought to protect the separation between settlements, and the steering group with the support of the City Council, sought to prove that sufficient brownfield land was available in the built up area to make it unnecessary to build on more green field sites.

The resistance to further greenfield development is a key theme in consultation with the community who have seen significant greenfield sites be developed in recent years and where promised transport improvements have not yet been delivered. The NDP was seen as one way to demonstrate that the city could grow within its existing limits in a sustainable way. This approach has not been welcomed by WC as will be shown in this section of the consultation statement where all relevant correspondence relating to the NDP is included.

What is not included is the significant detailed responses from SCC (Salisbury City Council) to the Regulation 18 consultations on the Local Plan Review (LPR). However, that body of correspondence is a key underpinning to the approach in the NDP. The NDP's advocation of brownfield development is a direct response to WC's proposals to allocate additional greenfield land adjacent to Salisbury's built up area. However, SCC's response to Regulation 18 LPR proposals is included in the Basic Conditions Statement.

Housing provision was not the only driver behind the NDP. All public consultation clearly demonstrated the community's desire to tackle the challenges of climate change – building better homes that were more energy efficient, planting trees, protecting the natural environment, having clean and beautiful outdoor spaces to enjoy, clean air. Again and again, the consultation showed that the people of Salisbury value their environment and want it to be protected and improved.



Explanation of the steering group's approach to preparation of the NDP

Salisbury City Council, as the qualifying body for the purposes of this NDP began work on the NDP in 2018. Consultants Create Streets held consultation events in January with 80 attendees.

On 4 March 2018, Salisbury City suffered the Novichok poison attack. On 11 July, a further incident occurred in nearby Amesbury. Salisbury, a city that relies heavily upon tourism and patronage from people in surrounding parishes, suffered a dramatic reduction in footfall which was 10% lower than the previous year (at November 2018).

Wiltshire Council led a Recovery Strategy and appointed a Director and team to deliver the strategy. The City Council was a participant and the Clerk was active in the discussions about Recovery. The Recovery Strategy was not published as a document but was rather a project with proposals to direct resources to. It had 4 key themes: high street, culture, perception and growth. Work on the NDP halted as a result.

Andrea Pellegram Ltd (APL) was invited by the City Clerk to advise on how the City Council could participate in the Recovery Strategy to ensure that the community's views were reflected. Accordingly, it was suggested by APL that the restart of the neighbourhood plan process would be the best means of incorporating outputs from the Recovery Strategy into tangible development and land use outcomes in the City. APL was appointed by the City Council as the planning consultant to support the preparation of the NDP.

On 10 January 2019, Andrea Pellegram and Tom Dobrashian (Interim Director Salisbury and South Wiltshire Recovery) attended a Councillor Briefing where Tom Dobrashian explained that Wiltshire Council's Recovery Strategy would produce a study called the Central Area Framework (CAF). The CAF became WC's main land use response for Salisbury, drawing upon policies in the Wiltshire Core Strategy 2015 and creating a new and updated policy approach. The CAF led to other projects such as the River Park and the Fisherton Street Gateway (Future High Streets Fund) which were delivered by Autumn 2022. The CAF underwent its own consultation and was the starting point for the NDP. It can be viewed on Wiltshire Council's website here: Salisbury Central Area Framework - Wiltshire Council.

APL advised that it would be helpful for the NDP to run alongside the production of the CAF since they had overlapping priorities such as development sites, infrastructure, healthy lifestyles, business and tourism, housing and design. At that time, it was hoped that the CAF and the NDP could be mutually reinforcing and that they would run on similar timetables. However, this did not happen and the NDP took longer to prepare, though it relied heavily on the CAF which is referred to in the NDP supporting text.

In the January 2019 briefing note, APL suggested that it would be helpful for the City Council to establish a Member Task and Finish Group to prepare a Terms of Reference for the NDP steering group, hold a public recruitment event and have an application process. The approach was based on a similar approach taken for the Chippenham NDP.

A community "Soft Launch" of the NDP was held on 27 January 2019 where members of the community were invited to join with City Councillors to form a steering group. Application packs were distributed and the event was widely publicised in the press and the City Council's media outlets such as its website and social media. Applications were vetted by APL, City Council officers



and Councillors, and the community members of the steering group were selected and invited to join.

The first steering group meeting was held on 9 April 2019 composed of 6 City Councillors and 6 members of the community. The group met monthly since that date except in the month of August and continues to meet to steering the course of the preparation of the NDP. It finally disbanded in September 2023.

In May 2019, the steering group agreed a logo and content of the NDP web pages to be hosted on the Salisbury City website (Salisbury Neighbourhood Plan - Salisbury City Council -). This has been kept up to date with details of who is on the steering group, the documents that have been produced, and most importantly, the minutes of every steering group meeting. It was therefore possible at all times for anyone to understand the progress of the NDP for all members of the public and City Councillors.

The Steering Group then hosted a series of "visioning" events where APL was supported by members of the steering group. Separate events were held in May and June of 2019 across Salisbury. The visioning events were targeted towards specific community sectors such as civic groups, businesses, young people, community support groups and most importantly, residents. The events were widely advertised. They were not heavily attended but enough participation occurred to enable the steering group to understand what policy direction would be required and supported by Salisbury. A total of 88 community members participated.

In June 2019, the steering group began to formalise its communications strategy and by September, the steering group were beginning to decide which policy themes to pursue. In July 2019, APL and members of the steering group attended a Wiltshire Council public consultation event on the local plan review (LPR) where attempts were made to agree the scope of the NDP in relation to the LPR. The Draft Vision was agreed in September 2019 which was retained and refined until finalised in the Regulation 14 draft NDP. The NDP Vision has been posted on the website since it was first drafted and has been updated over time.

In October 2019, a communications strategy was further developed with "key messages" to be delivered in all communications, including on the NDP web pages. An evidence-gathering work programme was prepared with steering group accountabilities for different topics. This was revised over the next year at most meetings. At this time, the steering group began to identify stakeholders who could be consulted about individual topics.

A draft statement of common ground was prepared between the NDP and the LPR but this was never agreed. The most recent correspondence is included in **Annex 1** (dated 30 March 2020). This correspondence shows that the steering group wished to work constructively with neighbouring parishes regarding cross-boundary infrastructure (green/blue and sustainable transport mainly). The advice was that the NDP should be restricted to the "urban area" which is different from the way that Salisbury is referred to in the LPR which includes Salisbury and neighbouring parishes. This distinction caused some difficulty for the NDP at the start of the process since the LPR figures and approach include areas outside Salisbury but the NDP was restricted to the parish boundary. In addition, housing figures were for the Salisbury area and not Salisbury parish.

By December 2019, individual topic leaders in the steering group had agreed a consultation strategy targeted at stakeholders and the community for each topic. Each topic targeted different groups such as local community interest groups or professional advisors and officers. The next few months



were taken up with individual steering group members contacting various stakeholders to help with gathering evidence for the NDP (the details can be found on the meeting minutes on the NDP web pages).

In March 2020, England went into lockdown following the coronavirus pandemic. The meetings with stakeholders that had been planned were cancelled or moved online. Instead, the steering group decided to engage with the community by way of an online community survey.

The survey and its results are described in the document "Salisbury Neighbourhood Plan Community Survey" which formed part of the Regulation 14 consultation. The survey ran from 1 May to 1 June 2020. There were 62 questions organised by NDP topic with a total of 1026 responses. The survey results became a key plank in the NDP evidence base because it indicated how the community supported various policy stances. This is fully described in the report which accompanied the Regulation 14 draft NDP.

In addition to the community survey, the steering group also supported WC by running the WC Green Infrastructure survey which would feed into LPR activities.

Also in June and July 2020, a call for sites was undertaken which invited all local landowners to put sites forward for consideration for allocation. The full call for sites is explained in Appendix 6 of the Regulation 14 NDP (which can be viewed in Part 4 of this Consultation Statement).

In September – December 2020, the steering group supported or had presentations from groups such as the Civic Society and COGS (a local cycling group) and discussed how individual topics were being supported by various community stakeholders. Also in this period and moving into January and February 2021, the steering group commented on various LPR activities including the Regulation 18 LPR consultation and the Riverpark Masterplan. These comments were informed by the views of the community that the steering group had been gathering up to that point including online meetings with neighbouring parish councils.

In April 2021, a separate online survey was undertaken aimed specifically at community groups and community infrastructure (mainly meeting places). A copy of the survey report can be found on the NDP web pages (<u>Community Infrastructure Survey - Salisbury City Council</u>).

On 10 May 2021, APL contacted the Head of Spatial Planning asking for a meeting to discuss Churchfields and it was agreed to hold a meeting on 24 May 2021. An email note of the meeting was prepared and is copied as **Annex 2** below.

In the May 2021 elections, the steering group chairman was not re-elected on the City Council. A new Chair was selected but she only lasted for a few months before resigning. The current chair was then selected and she remains today.

On 9 March 2021, APL wrote to the head of Spatial Planning at WC asking for specific figures for the NDP, see **Annex 2**. In the response to this (shown in blue text, NDP questions in red) the indicative figure of 410 housing requirement to be met by NDP "new sites" and this figure was stated to be based on the brownfield target. The steering group took this to be clear advice that the allocation of sites on brownfield land was supported. The LPA had been kept abreast of the site allocations to this point.

Also in the 9 March 2021 email, it was clearly stated that the City Council/NDP steering group continued to object to the greenfield allocation proposed in the Regulation 18 consultation (specifically site 6). The email refers to NPPF 118 c which gives substantial weight to the use of



brownfield land. The reasoning behind this for the steering group was that if the NDP could demonstrate that it would be possible to deliver 410 houses on previously developed land within the neighbourhood area, then it would weaken the case for greenfield development at LPR proposed Site 6.

The LPA pointed to paragraph 70 and 69a of the NPPF which encourages NDPs to allocate smaller sites. This was a clear warning from the LPA that the NDP should restrict its purview to smaller sites.

APL sought advice from Dave Chapman at Locality asking whether NPPF para. 70 limited NDPs to sites of 1 ha and he said in a telephone conversation that it did not. In the 2020 call for sites, the methodology was shared with the LPA before it was utilised and this did not restrict the sites to 1 ha. Therefore, the reliance in the 9 March 2021 email on the strict interpretation of NPPF 70 was different from that given in the execution of the call for sites. NPPF 70 states that "neighbourhood planning groups should also give particular consideration to opportunities". It does not state that neighbourhood plans are restricted to allocations of less than 1 ha. The steering group decided, in the face of this conflicting advice, to carry on with the allocations regardless of site size which by that time had been in the public domain. It also decided that it would consider whether to remove allocations after results from Regulation 14 consultation had been considered.

It is also worthy of note that the LPA's response promises further clarity on the final LPR approach to housing numbers and sites. This was never provided.

This email is also important regarding the approach taken to the Churchfields Masterplan (NDP policy 16). The NDP steering group had always made it clear that it wished to work within Core Policy 20 (which is explained in the supporting text of the Reg 14 NDP) and was asking in this correspondence what the latest position from the LPA was on that site and that policy. In the response, the LPA notes that policy on Churchfields had changed and that the 1100 housing expectation from Core Policy 20 "needs to be looked at holistically and include the relocation of existing users". This is a reflection of the LPA's Core Policy 20 approach which considered that all businesses needed to be removed from the area so that it could be comprehensively redeveloped. However, the NDP found a mechanism which relied upon natural turnover to bring about gradual change and this is the basis of the Churchfields masterplan. This fundamental disagreement about whether existing businesses should be decanted, vs. the approach to allow natural progression, is at the core of the steering group's approach to Churchfields. The steering group therefore decided to continue with its work on the Churchfields masterplan because it was certain that there was a reasonable alternative to the approach assumed in Core Policy 20, whilst still fitting in with the general thrust of that policy. What the NDP did that was different from Core Policy 20 that it assumed less housing (as confirmed in the Wiltshire Housing Site Allocations Plan 2020) and that change did not necessarily need to be based on a wholesale clearance of existing businesses.

It is important to note that the Regulation 18 version of the LPR now takes an entirely different approach to Churchfields than Core Policy 20 – it now seeks to intensify commercial activity in this location. SCC has objected strongly to this approach.

A final point of disagreement on Churchfields arose from the traffic implications. At present, many of the businesses in Churchfields generate HGV traffic that simply cannot fit under bridges or impact negatively upon the Salisbury central conservation area. The unofficial LPA approach indicated in the email is that more businesses should relocate into Churchfields. The steering group felt strongly that this would be the wrong approach because businesses tend to require large vehicles whereas housing next to the railway station and the city centre would be accessible by foot at best, and cars



at worst. Therefore, the steering group resisted the LPA's approach to put more commercial activity in Churchfields.

Other matters discussed in the 9 March 2021 email are the Waste Local Plan review which the steering group felt was necessary in order to find a relocation site for the household waste recycling centre in Churchfields (which is a significant generator of HGV and car traffic), and Quidhampton Quarry where the LPA considers that the NDP should not seek to redevelop for housing on the grounds that its planning context was "complex". However, the steering group had been working closely with the land owner and their agent and was convinced that the LPA's response had not take account of recent permissions and correspondence with the LPA's development management team. Again, the steering group decided it was appropriate to continue with its approach to Churchfields and the quarry.

A further response was given dated 25 May 2021 on the same email trail (still **Annex 2**). In this correspondence, there is no resistance to the allocation at Brown Street. The contents of this email were ultimately used to commission transport consultants under the Neighbourhood Development Order Locality Grant for Brown Street Car Park.

The meeting referred to in the previous email, and the comments made in the email, indicated that officers were resistant to the Churchfields Master plan for the reasons set out above and in the text of the NDP and the masterplan. The steering group had taken advice from Locality regarding this, again in a telephone conversation and in-person, with Dave Chapman. Locality and AECOM, who were doing the masterplan, felt that it was in conformity with Core Policy 20. The LPA eventually supplied "confidential" reports which demonstrated that the site had contamination (which the steering group was aware of) and that it was not viable to decant all businesses to another site and redevelop the site holistically. However, as the steering group representatives explained to officers, it was not the masterplan's intention to relocate any businesses, but rather to allow for natural turnover with good design parameters for incoming businesses or residential developers.

In the hope of fostering a more productive relationship between it and the LPA, the steering group wrote to the Corporate Director of Place who had initially supported the Churchfields masterplan and joint working following a difficult meeting between the steering group and the new interim planning manager. This is the letter shown in **Annex 3**, dated 14 May 2021. This letter is also important because it questions the LPA's approach that the site is strategic, since the masterplan would be prepared in accordance with Core Policy 20 and that the LPR had not indicated which sites would be included, nor specifically how Churchfields would be addressed.

To reiterate what is in the NDP text and the masterplan, the steering group were very concerned about Churchfields because this industrial area generated significant HGV and car traffic in the town centre causing harm to the conservation area and the "vibe" of the shopping area, it was not providing much needed housing, and the urban design of the area was poor. A masterplan in accordance with the development plan policies could do much to address these matters. From the steering group's perspective, the issue was not that the emerging NDP policy was not compliant, but that the LPA wanted the site to be in the LPR, though it would not give any indication how that would occur.

In autumn 2021, the steering group finalised which sites it proposed to take forward as site allocations. It planned community consultation events in September and October 2021 where people were invited to give their views on the allocations and the relevant proposals. These consultations were in the form of stands at the market place and People in the Park. In addition, a



very well attended all day event was held in Bemerton to allow people to comment on the proposals for a housing allocation in Quidhampton Quarry (3 November 2021). The results of this particular event were used to amend the scheme that would eventually be put into the Regulation 14 consultation document.

The steering group prepared a report that was put on the NDP website "Report and Update for the Community about the Salisbury Neighbourhood Development Plan's Community Engagement work in September and October 2021" which can be found on the NDP pages of the website.

The steering group had not formally asked WC for a view at this time because the consultation exercises were a "temperature check" with the community and it was not a formal consultation. However, the LPA provided very detailed comments on the site allocation proposals in a letter to the City Clerk dated 18 October 2021. The full letter is copied in **Annex 5**. The letter was analysed by APL and considered by the steering group in its November 2021 meeting. The full set of responses/comments is provided in **Annex 6**.

The proposer of Quidhampton Quarry specifically addressed points made by the LPA in its 18 October letter in a response dated 15 November 2021 from Terence O'Rourke. This letter refuted most of the points made by the LPA giving the steering group confidence that the approach to Quidhampton Quarry was sound. The letter is copied in **Annex 7.**

In December 2021, the steering group received a letter from the Interim Chief Planning Officer from WC restating its policy objection to the NDP's allocation of land at Quidhampton Quarry for housing in response to the letter from Terence O'Rourke. This is copied in **Annex 8**. This letter is very much a refined policy argument that must ultimately be addressed in the NDP Examination. However, in the event, this allocation too was dropped.

At this stage, it is important to note the fundamental disagreement between SCC and the LPA on these matters of planning policy. However, the importance for this Consultation Statement is that the NDP is seeking to make best use of previously developed land that had consistently failed to meet strategic policy aspirations and where its restoration conditions could not be delivered. The NDP is seeking an alternative use of the quarry site for the provision of much needed housing and that will avoid the use of greenfield sites. The steering group agreed at this stage that the site allocation would only be withdrawn if the local community objected too strongly or if the transport access issues could not be agreed with the Highways Authority. In the end, all allocations were withdrawn because of the opposition from the LPA.

Also in December 2021, the steering group was invited by WC to comment on the LPR's place shaping priorities. The steering group prepared a suggested response that sought to align its vision priorities with what would eventually appear in the LPR. This is copied in **Annex 10** in support of a meeting with officers in January 2022. This was presented to officers but no confirmation was received that the LPR would reflect the NDP vision.

Also in December 2021, The City Council wrote to the leader of WC to ask when the parking study anticipated in the CAF would be forthcoming. This is copied in **Annex 9**.

The steering group chairman, consultant (APL) and the City Clerk met officers following this letter to discuss a way forward on 2 February 2022.

In February 2022, community consultation events were held online to discuss the Churchfields Masterplan. Lockdown was in place at this time and therefore all consultations were done using



Microsoft Teams. A separate consultation was held with the Business Improvement District. The BID and the Chamber of Commerce offered to assist with further consultation but failed to respond to subsequent emails and no joint work progressed.

On 9 February 2022, Wiltshire Council issued a press release (**Annex 11**) during the consultation on the Churchfields masterplan. This stated in public, during a community consultation, that it would object to site allocations at Churchfields and Quidhampton Quarry. The steering group considered this to be unreasonable and an attempt to subvert the public consultation.

In spring 2022, the discussion document "Let's Talk About Housing" which was included in the Regulation 14 consultation, was written as a plain English guide explaining the steering group's approach to delivery of housing in the NDP. This was also subject to a press release in the Salisbury Journal and an article was published.

On 28 April, the WC Cabinet Member for Transport wrote to the City Clerk stating that the Local Transport Plan, including the parking study, was about to be reviewed. This was identified by WC as an indication that the Brown Street Car park allocation should not progress. The steering group considered this view to be contrary to WC's published policies in the Core Strategy (text only) and the CAF. By this time, the steering group had employed transport consultants in accordance with LPA advice from 2021 (Annex 12) as part of the neighbourhood development order. Since the letter did not specifically withdraw the site from consideration, the steering group decided to continue with the allocation to Regulation 14.

In March to June, the documents were with the graphics designer and were being finally agreed with the steering group and no consultation activity took place. Maps were produced with the assistance of Oxford Cartographers working alongside the steering group and planning consultant.

On 17 October 2022, the City Council wrote to Richard Clewer, the leader of WC, to ask about the Salisbury Parking study (Annex 13). This has not been answered when this Consultation Statement had been prepared.

Leading up to and during the NDP Regulation 14 consultation, WC's Leader wrote a number of articles in the Salisbury Journal about the NDP and the consultation. It was responded to by the NDP steering group's Chairman. The text is copied in **Annex 14**. The steering group considered that the articles interfered with the running of the Regulation 14 consultation and that they would discourage some Salisbury residents from commenting or participating. The steering group did not consider that all the assertions put forward by WC were accurate. Brown Street redevelopment remains a WC policy in the CAF and the text of the Core Strategy. Viability would have been tested as part of the neighbourhood development order for the site – there are no firm proposals for the site at present so viability cannot yet be tested.

In WC's Environment Select Committee (20 Sept) Agenda for Environment Select Committee on Tuesday 20 September 2022, 2.00 pm | Wiltshire Council it was announced that the LPR would be delayed. It was previously expected that the Regulation 19 consultation on the LPR would start in December 2022 or January 2023. It finally began in October 2023.

Consultations undertaken for individual policies and for the evidence base

The steering group consulted extensively with targeted stakeholders throughout the evidence-gathering phase of the drafting process. The table below lists the main stakeholders that were consulted for each policy or supporting document.

NDP Policies

Policy number/name	Main consultees
1: Tree planting for carbon capture	Community survey
2: Air quality	Community survey
3: Carbon neutral development	Chippenham NDP steering group
	Centre for Sustainable Energy
4: Electric vehicle charging points	Community survey
5: Habitats Regulations	Wiltshire Council Ecologists
6: Design in the built environment	Historic England
	Salisbury Civic Society
	Wiltshire Council
7: The Close and its Liberty	Historic England
	Salisbury Civic Society
	Wiltshire Council
	Salisbury Cathedral
8: The Chequers	Salisbury Civic Society
	Wiltshire Council
9: Protecting views of Salisbury cathedral spire	Salisbury Civic Society
	Wiltshire Council
10: Enhancing blue and green infrastructure	Salisbury Area Greenspace Partnership
and biodiversity	Salisbury City Council parks team
	Wiltshire Council Green Infrastructure Team
	Salisbury and Wilton Swift Group
11: Habitat improvement and restoration	Salisbury Area Greenspace Partnership
schemes	Caliahama Anna Curananana Dantaranahin
12: Open Space Provision	Salisbury Area Greenspace Partnership Wiltshire Council Green Infrastructure Team
13. Local groon chaces	Salisbury City Council parks team
13: Local green spaces	Salisbury Area Greenspace Partnership Wiltshire Council Green Infrastructure Team
	Salisbury City Council parks team
14: Construction and development	Wiltshire Council Ecologists
management for projects affecting the River	Witsilie Council Ecologists Wessex Rivers Trust
Avon SAC	Salisbury Area Greenspace Partnership
15: Housing mix and affordable housing	·
13. Housing thix and anordable housing	Wiltshire Council Housing Team
16. Churchfields and Engine Shed	Community survey Wiltshire Council
16: Churchfields and Engine Shed	
	Planning Authority
	Property Department
	Waste Planning Authority
	Housing Team
	Ecologists Business Improvement District
	Business Improvement District Public consultation events online
17: Healthcare facilities	Community survey
	Salisbury hospital
	GP surgeries (particularly Three Chequers)
	NHS (various teams)



	Community survey
	Community consultation events for Brown
	Street allocation
	Wiltshire Council Housing Team
18: Community infrastructure	Community Providers
10. Community initiastructure	Facilities Providers
	Salisbury City Council
19: Allotments	Salisbury City Council
13. Allothents	Salisbury Area Green Space Partnership
20: Provision for Play and Sport	Salisbury City Council sports team
20. Flovision for Flay and Sport	Informal consultation with Salisbury sporting
	teams and groups by SCC
21. Sustainable transport	
21: Sustainable transport	Wiltshire Council Highways Authority
	Wiltshire Council Local Planning Authority
	Salisbury MP
	Wiltshire Council Director for Transport
	Salisbury Car Share Club
	COGS (local cycling group)
22. Cooling and walking infrastructure	Salisbury Area Greenspace Partnership
22: Cycling and walking infrastructure	Wiltshire Council Highways Authority
	COGS (local cycling group)
22. C.d	Salisbury Area Greenspace Partnership
23: Cycle parking	COGS
24: Cycling for pleasure	Salisbury Road and Mountain Cycle Club
25: Residential car parking	Steering group
26: Working from home and live-work units	CAF consultation
	Community survey
27. Visitor accommodation	Wiltshire Council Housing Team
27: Visitor accommodation	Community survey
28: Post offices	Wiltshire Council Local Planning Authority
	Steering group
29: Major food retail	Community survey
	Steering group Salisbury City Councillors
20: Quidhamatan Quarry	Wiltshire Council
30: Quidhampton Quarry	
	Local Planning Authority
	Highways Authority
	Ecologists
	Waste Planning Authority
	Housing Team
	National Highways
	Natural England National Rail
	In person all day consultation event for
	Bemerton residents
	Online meeting with Quidhampton Parish Council
	Ward Councillor
31: Coldharbour Lane	Locality National Grid (and their agent)
31. CUIUIIdIDUUI LAITE	National Grid (and their agent)



	Wiltshire Council
	Housing Team
	Local Planning Authority
	Highways Authority
	Ecologists
	Residents of WC housing scheme in Amesbury
	Waitrose (owner of access on far bank of the
	river)
	Ward Councillor
	NHS (various teams)
	Salisbury Car Share Club
	Locality
32: Brown Street Car Park	Wiltshire Council
	Local Planning Authority
	Highways Authority
	Housing Team
	NHS (various teams)
	Public consultation activities Autumn 2021
	Ward Councillor
	Locality

Supporting Documents

Document name	Main consultees
Churchfields Masterplan	Wiltshire Council
	Planning Authority
	Property Department
	Waste Planning Authority
	Housing Team
	Ecologists
	Business Improvement District
	Public consultation events online
	Community survey
A Design Guide For Salisbury	Salisbury Civic Society
	Wiltshire Council
	Salisbury Area Greenspace Partnership
"Shopfront" and Class MA Development Design	Salisbury Civic Society
Guide	Wiltshire Council
Community Survey – Findings of the public	Online survey for all stakeholders
survey: 1 st May – 1 st June 2020	
Salisbury Housing Needs Assessment	Wiltshire Council Housing Team
Salisbury Profile	SW LEP
	Porton Down
	Chamber of Commerce
	Educational institutions
Habitats Regulations Assessment	Wiltshire Council
Strategic Environmental Assessment	Natural England
	Historic England
	Environment Agency
Let's Talk About Housing	Wiltshire Council Housing Team



Community Infrastructure Survey	Community Providers
	Facilities Providers



Annex 1: Email correspondence between WC and APL, 30 March 2020

Salisbury SoCG and Strategic Priorities



Bryant, Ray <Ray.Bryant@wiltshire.gov.uk> andrea@pellegram.co.uk

Cc Milton, David I) You replied to this message on 30/03/2020 11:23.

Many thanks for your email.

In terms of the SoCG we are currently defining which other parishes ought to be signatory; we are aware that the geography will need to be as broad as is necessary to make the agreement work.

The planning obligations matter is noted.

I should also mention — as previously I omitted to do so - that the residual housing number quoted, whilst updated, is still being finalised and is not in the public domain. For this type of reference, figures for Salisbury are those published via Cabinet papers in April 2019 - https://cms.willshire.gov.uk/iet.istMeetings.aspx/Cld=141&Year=0

I will be in touch again soon and in the meantime will continue to liaise with David Milton and team

Regards

From: andrea@pellegram.co.uk <andrea@pellegram.co.uk>

To: Bryant, Ray < Ray.Bryant@wiltshire.gov.uk>

Cc: 'John Farquhar' com; Milton, David David mailto:square-moutlook.com; 'Annie Child' Achildo:square-moutlook.com; Milton, David mailto:square-moutlook.com; 'Annie Child' Achildo:square-moutlook.com; Milton, David David Davi

Subject: RE: WC-SCC Statement of Common Ground: draft

Hi Ray

We were able to discuss your comments both with David Milton and with the Steering Group and I have further comments which I attach to YOUR comments. Where I have made no comment, please consider this agreed.

IOINT WORKING

We are very happy with the existing arrangements working with David Milton and his team

SoCG SIGNATORIES

The SoCG essentially agrees and divides the labour. It is not the development plan itself. In this regard it is believed that the SoCG should concern the Solisbury urban area, the zone of mostly continuous development constituting the city's urban form. This 'urban area' does flow into surrounding parishes (most noticeably Laverstock-Ford) meaning that such parties will also need to be signatory to the SoCG. We are essentially governed by the settlement hierarchy, which is deemed important to localities on the city's periphery. Laverstock and Ford for instance are classified as 'Small Villages' and, unless they decide differently, would not be expected to take substantive quanta of new development except where this prospectively extends the Salisbury urban area within their parish boundaries. For its part Wilton is classified as a Local Service Centre; it is not within the Salisbury urban area and will have its own local plan review housing number. This notwithstanding there will evidently be larger than-local initiatives that Wilton will participate in.

We see that the other signatories are required for reasons other than housing allocations. We see that we need to open discussions with our neighbouring parishes with regard to matters such as a joint approach to CIL (both that retained by the planning authority and the 15-25% parish portion) and green infrastructure and sustainable transport policies that will cross boundaries. We consider that the SCG is the best means to bring all parties to the table to discuss these cross-border issues and we remain of the view that all surrounding parishes should be included in the SOCG.

Wiltshire Council has introduced CIL. This usually focuses on the provision of generic new infrastructure; local specifics / deficiencies can be remedied by section 106 planning obligations.

When considering infrastructure, especially for s106 funding, it is important that the City Council quantify and justify local needs. If the SNDP is compiling a list of infrastructure reeds in preparation for future Community Infrastructure Levy (CIL) funding, it is likely that it will not be possible to fund all requirements - therefore prioritisation, based on robust evidence, will aid decision-making.

We wish to have a more precise and robust approach to the allocation of CIL. At the very least, we wish to have assurances that CIL collected in the Salisbury urban area/conurbation is spent in this area and not elsewhere in the County. We understand that the NDP must supply robust evidence to assist prioritisation but there is this more fundamental issue which takes precedence. We feel that the SOCG should provide reassurance how CIL will be collected and distributed. This includes clarification on how funding will be leveraged from strategic development (either CIL or \$106 or both). I can provide further commentary based on planning practice guidance if that would be

CAF (Central Area Framework)

The point on how the CAF will integrate with respective plan time horizons is noted. Work on the CAF has progressed and, at the document's last iteration, a number of SPDs have been requalified as 'masterplans' (e.g. Railway Station and The Maltings / Central Car Park). SPDs currently being considered include Shopfront Guide and Creating Places. There will also be a piece of work on making Central Area uses more flexible in order to maximise vitality. Whilst Dave Milton's team is likely to have more details on the CAF it remains unclear as to the modus operandi for executing these workstreams: a division between LPR and SNDP appears however likely and the SoCG will in time be

We have discussed this with David Milton who is leading on the CAF and have clarified (for your information) that the NDP will be covering: Shopfront Guide, Creating Places and flexibility.

Taking the above into account, may we please see a second draft for discussion at our meeting on 14 April?

Follow up: Salisbury NPG Churchfields & NDO Brown Street Car Park



Dear Andrea,

Thank you for meeting with Ray and me yesterday, it was good to have a constructive meeting and to reach some common ground. I am sorry that Annie couldn't join us.

As mentioned, we will investigate further the sharing of the earlier work that was undertaken on Churchfields, as it would make sense for you to have the same understanding we do about the complexities around the redevelopment of the Churchfields site. I understand that Peter Dunbar, one of the Steering Group members, has already been in contact with Richard Walters about this so will be familiar with some of the headline findings.

As you appreciate this is commercially sensitive so it may not be straight forward, but we'll see what we can do!

Thank you for sending through the latest communication from AECOM with regard to the proposed Masterplan work, which we will look at and get back to you.

I promised to provide the advice from colleagues in Sustainable Transport to outline what would be required in terms of information to support the proposed Neighbourhood Development Order (NDO) for Brown Street Car Park, particularly in relation to parking data as envisaged by the Central Area Framework. From our discussion yesterday it sounds like you already have an understanding of the need for transport evidence, so hopefully this will help develop the work you had in mind and you can pass it onto your consultants to address.

The NDO would need to be supported by a Transport Assessment in accordance with:

- Travel Plans, Transport Assessments and Statements GOV.UK (www.gov.uk)
- The attached guidance.

We would also need to understand the potential impact of redeveloping Brown Street car park on parking in the local area. Our Parking Services team can provide the following information for both Brown Street and Culver Street (as the probable alternative car park facility):

- Usage (ticket) data for 2019 (pre Covid) and current year split by month
- Permit numbers allocated and by type

The above information would need to be supplemented by a parking survey which detailed parking capacity and usage in an agreed survey area (i.e. to include Brown Street and Culver Street car parks). The survey would need to capture both day and evening use (to capture evening economy use and by residents). The actual details of the survey would need to be agreed with the Council at the appropriate time.

Ultimately, the results of the survey should be collated and incorporated into the Transport Assessment (or as a separate Car Parking Report), which includes full details of the parking survey, as well as a review of car parking demand and provision. This should include:

- Details of the proposed redevelopment (use, size, location etc.).
- Car parking facilities to be provided as part of the development.
- Details of car parking that will be lost as a result of the development and an assessment of displaced demand and what realistic alternatives there are to meet this lost parking/displaced demand (this will need to include an access/accessibility assessment of the alternative options)
- An estimate of car parking demand of the development.
- An estimate of car parking demand that will have to be met off-site
- Details of on-street parking facilities, public car parks, parking restrictions, residents parking, pay and display parking facilities etc. within the survey area.
- Full details of the parking survey results, including details of existing parking demand and available capacity for each street and car park within the surveyed area, as well as an overall summary
- . A review of whether sufficient capacity/realistic alternatives is available to meet the demand of the development and the displaced parking.
- Details of any issues relating to parking identified (e.g. abuse of parking restrictions).
- Full details of the survey results (including photos and survey sheets).

Hopefully this all makes sense and helps, my colleague Rob (Principal Transport and Development Manager - West and South) would be happy to provide clarification of anything and will be able to arrange to share data we hold with your consultants. Are you able to let us know who will be doing this work so we can respond at the appropriate time? I have copied Rob into this email so you have his contact email address.

Kind regards

Georgina Clampitt-Dix Head of Spatial Planning Economic Development and Planning



Re: Evidence required for the Salisbury NDP



Clampitt-dix, Georgina < georgina.clampitt-dix@wiltshire.gov.uk>

To andrea@pellegram.co.uk Cc 'Annie Child'; Cllr Jo Broom; Marshall, Jean; Fox, Sam; Katharine O'Connor; Bryant, Ray

Dear Andrea

Trust you had a good break over the summer.

A belated thank you for your email. It was good to hear that you had a positive meeting with Officers in July. I was sorry not to have been able to join you.

As requested, we have prepared a response to the questions presented in your email and thank you for the generous timescale that you have provided in which to respond. Some of the responses are quite short, as they are matters we have discussed previously or we weren't clear about why you were asking a particular question. For ease of reference, the responses are set out in blue text and embedded into your email. I have explained below that we are undertaking further work following the consultation on the Local Plan earlier this year, which inevitably has implications for the timing of the draft Local Plan. As a result there is possibly not the level of information and that you might have hoped for.

If the Steering Group would like to discuss anything further please let me know.

Kind regards

Georgina Clampitt-Dix Head of Spatial Planning Economic Development and Planning

Wiltshire Council

Tel: 01225 713472

Email: georgina.clampitt-dix@wiltshire.gov.uk

Web: www.wiltshire.gov.uk Follow Wiltshire Council



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From: andrea@pellegram.co.uk <andrea@pellegram.co.uk>

Sent: 15 July 2021 16:15

To: Clampitt-dix, Georgina < georgina.clampitt-dix@wiltshire.gov.uk >

Cc: 'Annie Child' <achild@salisburycitycouncil.gov.uk>; Cllr Jo Broom <ibre>
| Survey | Surve

Subject: Evidence required for the Salisbury NDP

Dear Georgina

I just had the pleasure of a meeting with senior officers at WC regarding Churchfields. A few items were discussed that I believe you can assist with. Rather than leaving this to Ray, who has been very helpful, I am sending it directly to you since I believe you are the holder of this information. Ray has set up a number of meetings which is particularly helpful.

We have a project plan that leads to Reg. 14 consultation in December 2021. We will have draft chapters by September. To this end, we now urgently require information from you and your team so that we can properly prepare our emerging policies and supporting text. We hope to run a series of consultation events in September and early October for our site specific policies. Please let us know if you wish to be involved and we will gladly include you.

It has now been many months since the LPR consultation and you will be releasing your Reg. 19 draft plan in a few months. I therefore expect that you are now in a position to answer all these questions. Please therefore may we have Spatial Planning's views on the following questions in red.



Re: Evidence required for the Salisbury NDP



Cc 'Annie Child'; Cllr Jo Broom; Marshall, Jean; Fox, Sam; Katharine O'Connor; Bryant, Ray

(i) You forwarded this message on 06/09/2021 09:48.

Housing Requirement for Salisbury:

- . May we please have the housing requirement for Salisbury Parish according to NPPF 65?
- If this figure cannot be supplied, can you please supply an indicative figure, as set out in NPPF 66? Please do not provide the Brownfield Target unless you now state that this is our indicative figure. See comments below on this.

On the basis that you are looking to plan for the period consistent with the emerging Local Plan Review (to 2036), in accordance with paragraph 67 of the July 2021 National Planning Policy Framework (NPPF), the indicative figure for the Salisbury neighbourhood area for the purpose of neighbourhood planning would be 410 homes, which the neighbourhood plan should aim to meet through new sites. As you appreciate, this is based on the brownfield target proposed in the recent consultation on the Local Plan Review which set a figure for the 10 year period 2021 to 2031 on the basis that plans would be reviewed and new sites could be introduced if the recent planning would be reviewed and new sites.

This represents the best information available at this time but we will need to keep it under review, in discussion with you, as the Local Plan and your plan progresses to ensure continued conformity with emerging Local Plan policy.

Please note also that Planning Practice Guidance encourages neighbourhood planning bodies to plan to meet their requirement and where possible to exceed it (see Paragraph: 103 Reference !D: 41-103-20190509). This flexibility provides the opportunity to not be restricted by a number.

In addition, I would also like to take the opportunity to draw to your attention paragraph 70 of the NPPF, which states that neighbourhood planning groups should give particular consideration to the opportunities for allocating small and medium sized sites suitable for housing in their area. Paragraph 69a indicates that these should be no larger than one hectare.

Greenfield allocation at Site 6:

As you are aware, Salisbury City Council and the NDP SG are very strongly opposed to the allocation of land at "Site 6" for the reasons set out in their response to the LPR. As you are also aware, the NDP is working very hard to identify alternative brownfield sites to demonstrate that the housing that could have been provided on Site 6 will be delivered on brownfield land within the Salisbury Boundary. NPPF 118c states that planning policies should give <u>substantial weight</u> (emphasis added) to the value of using suitable brownfield land within settlements for homes and other identified needs.

- Can you confirm that the LPR will give substantial weight to the reuse of brownfield land and that it will give preference to brownfield land to meet Salisbury's housing requirement?
- . Have you come to a view on the suitability of Site 6 and do you anticipate that it will be brought forward as an allocation in the next draft of the LP?

Core Policy 2 'Delivery Strategy' of the Wiltshire Core Strategy sets a general presumption in favour of sustainable development within the "limits of development", also known as settlement boundaries that were reviewed and updated through the Wiltshire Housing Site Allocations Plan. As such it is (subject to other policies within the local plan) supportive of development that makes best use of urban land and neighbourhood plans are able to positively identify brownfield or urban sites in their plans in line with this policy. Outside the settlement boundaries, Core Policy 2 is much more restrictive for housing requiring it to be brought forward as allocations through a development plan process or in line with exception policies listed in paragraph 4.25.

The Local Plan Review is likely to continue to contain a similar policy, which would be consistent with national policy and form part of a policy framework supporting the delivery of brownfield sites.

The current Wiltshire Core Strategy is reliant on both brownfield and greenfield sites to meet the level of growth to be planned for, for the Principal Settlement of Salisbury and the deliverability of brownfield sites that can be positively identified for development. Through the neighbourhood plan there is the opportunity to identify deliverable brownfield sites to help reduce the need to allocate greenfield sites.

Clearly, we would prefer to allocate brownfield over greenfield but ultimately as the strategic allocations in the Local Plan at both Churchfields and the Central Car Park has shown these can be inherently difficult to bring forward and therefore if reliance is to be placed on such sites to meet housing requirements there needs to be sound evidence that they can be delivered.

With regard to Site 6, no decision has been made on which allocated sites will be included in the draft Local Plan, this will become clear when proposals are reported to Cabinet as part of a draft Plan.

Further to Cabinet on 29 June 2021 when the outcome of the consultation on the Local Plan Review was reported, we are now undertaking further work which includes: testing the upper and lower levels and spatial distribution of the range of housing need for the plan period and a review of the employment evidence underpinning need for new employment land. In the light of this, we are currently reviewing the timeline for the Local Plan Review to take into account this new work, which will push back consultation on a draft Plan until 2022. We will of course let you know when the Local Development Scheme has been updated with a new timescale.



Brownfield target:

As you know, Salisbury City Council has significant reservations about the robustness of the Brownfield Target and has pointed out in its representation to the LPR that this approach is not found in the NPPF and we feel has no place in planning therefore. I will not rehearse those arguments here.

- Can you please update us on the Wiltshire Council's position on the Brownfield Target and its relationship to greenfield allocations in this LP review and subsequent reviews?
- How does the Brownfield target relate to "windfall" as set out in NPPF 70?

Please see above. We understand the points that Salisbury City Council is making about the 'brownfield target' and will be addressing these alongside all other comments received as we progress with the Local Plan Review.

Churchfields

I understand that this is still intended to be a strategic policy. However, the NDP will be preparing a masterplan and possibly NDOs for parts of the area, focusing on WC owned land. In the meeting today, I informed senior officers of our intentions. Ray has assured me that though the policy will remain strategic, the NDP policy will be taken into account.

- What is the emerging strategic policy position on Churchfields and how will Core Policy 20 be updated?
- May we please have sight of all evidence that will be used for the updated strategic policy so that we can use it as well (we have seen the CAF so we don't need another copy)?
- May we please have an explanation of how the 1100 homes that were to be delivered in Core Policy 20 will be addressed in Salisbury's housing need figure?
- What are your intentions regarding consultation with Salisbury Stakeholders on the update of strategic Core Policy 20 and may we please start putting dates in diaries to ensure that this consultation will align with the NDP's planned September consultation events?

The Council is reviewing the strategic allocation for Churchfields as part of the Local Plan Review. We have spoken and communicated extensively about this site, so I won't repeat the detail here. One of the main issues with delivering the current allocation is that it needs to be looked at holistically and include the relocation of existing users. We have provided substantial evidence that has been shared in confidence about the viability of the site for housing, which was discussed at the meeting in July as well as the issues around freeing up Council owned land for reuse. However, we do appreciate that work is being undertaken by AECOM on behalf of the Steering Group and would welcome early sight of this to understand what it is showing.

Consistent with the Central Area Framework, as part of the Local Plan Review consideration is being given for a new policy to be developed around its continued use and regeneration as an employment location.

As referred to above, in response to the recent consultation and as resolved by Cabinet we are undertaking further work to review the employment evidence underpinning the emerging Local Plan. This will include the assessment of supply of employment land at Salisbury and will take into consideration the role of Churchfields as an existing employment site and how this could evolve in the future. We will share with you, when we are able to any new evidence about Churchfields.

In preparing the Wiltshire Housing Site Allocations Plan, which was adopted in February 2020, it was recognised that the 1,100 homes proposed at Churchfields could not be counted towards the supply of land at the Principal Settlement of Salisbury to meet the Wiltshire Core Strategy requirement to 2026, as a result new sites were allocated to help meet the predicted shortfall. It would be helpful to understand the reason for your question about the 1,100 homes to provide any further explanation.

The next stage of consultation for the emerging Local Plan Review will be once the draft Plan has been prepared and is published, as such there is no opportunity to align engagement with your forthcoming planned consultation.

In the Salisbury City Council response to the LPR, the matter of the consultation document appeared to be flawed. It was pointed out that the comments from responders sought largely to redevelop Churchfields and reduce its traffic impacts, whereas the officer response came up with another conclusion which was to "intensify employment sites to provide higher job densities". SCC where concerned that the conclusion did not flow from the evidence.

• Can you please clarify whether SCC misunderstood the officer's response in this document and whether the emerging policy will result in MORE traffic entering Churchfields?

In reviewing and shaping any new policy for Churchfields, we will be considering the issues with the site including those raised about traffic impacts and what the opportunities are to resolve these. In particular, the issue of commercial heavy goods vehicle movement, which is understood to be a key concern. Intensification does not necessarily mean more traffic, as ultimately it would depend on the nature of the business and how employees travel to work.

As set out in the recent consultation on the Local Plan Review, the Place Shaping Priorities that are in development for Salisbury are also relevant for any future policy development. These explicitly include Churchfields as follows: "Improving Churchfields such that it integrates better with the city, particularly for non-vehicular access, and presents a more accessible location to attract a greater diversity of businesses." The priorities are being reviewed in the light of the consultation response and we will of course wish to engage with Salisbury City Council about these as they are shaped.



Re: Evidence required for the Salisbury NDP



Clampitt-dix, Georgina < georgina.clampitt-dix@wiltshire.gov.uk>

Cc 'Annie Child'; Cllr Jo Broom; Marshall, Jean; Fox, Sam; Katharine O'Connor; Bryant, Ray

← Reply ← Reply All → Forward Fri 03/09/2021 17:16 Fri 03/0

Waste Local Plan Review:

We have previously corresponded about the Waste Local Plan Review which is now necessary because the policies in the Waste Core Strategy and Waste Development Control policies pre-date the NPPF and National Planning Policy for Waste.

- · How have you most recently worked with Swindon Borough Council with regard to updating this policy?
- . Have you considered severing the policy relationship with Swindon Borough Council since they are now largely self-sufficient for waste operationally?
- . Do you have an updated programme start for the Review of the Waste Core Strategy and Waste Development Control Policies? If not, why not?

It is understood that these questions arise from the desire to see the current waste uses on Churchfields relocated. As previously communicated, this does not necessarily need a review of the Waste Local Plan to make this happen but is linked to the development of the Council's waste strategy.

As set out in the Council's Local Development Scheme (LDS), the Council is currently prioritising the preparation of the Wiltshire Local Plan, as we have been undertaking some preliminary work to understand the nature of the review. The LDS will be updated in due course. It is still envisaged that the Council will continue to plan jointly with Swindon Borough Council for Minerals and Waste matters.

Quidhampton Quarry

Core Policy 20 also refers to Imerys Quarry which we refer to as Quidhampton Quarry. As you know, we are negotiating with the site owner to progress a housing development there contingent upon a favourable view from the Highways Authority that a suitable access arrangement can be achieved.

- . Do you intend to lower the policy level on this site so that it is no longer "strategic"?
- If not, how do we align the NDP and the LPR policies?

Quidhampton Quarry, also known as 'Former Imerys Quarry' is included within Core Policy 20 as an employment allocation - referred to as land that is identified for strategic growth. As you appreciate, it is also an allocation in the Wiltshire and Swindon Waste Site Allocations Plan Local Plan (adopted February 2013) and the site has not been restored from its former mineral use therefore the existing or any future landowner would be bound by outstanding restoration requirements. The site as you also know has access issues, which Highways England (now National Highways) has reiterated their concerns about in the response to the resent consultation on the Local Plan.

The above in itself illustrates the complexity of bringing forward this site as we have discussed with you previously and also in the light of the basic conditions that the neighbourhood plan will need to pass through examination, we still have concerns about the neighbourhood plan being the right vehicle to bring forward the regeneration of this site given the strategic policies that relate to it. Even if the site was no longer identified for employment through the Local Plan Review there would still remain the issue of the waste allocation.

The desire of the Steering Group to look at this site is fully appreciated, as is the work that has gone into considering its future. We would be happy to meet with you together with the landowner and their agent to explore the issues surrounding this site more fully.

Maltings Masterplan

The Steering Group are concerned that the Maltings project is stalling. They wish to comment upon this though I have advised them that it would be unwise to have a policy since I consider that the Maltings Masterplan is relatively current and is strategic. However, I expect that the supporting text will refer to the

· Are there any plans to update the Maltings Masterplan or will this SPD remain the evidence for this policy?

At this stage there is no intention to update the Masterplan. Just by way of clarification, on 19 June 2019 the Strategic Planning Committee endorsed the Maltings and Central Car Park Masterplan as a material consideration in the determination of relevant planning applications, it should not therefore be referred to as a Supplementary Planning Document. You are correct that at this time this remains current information that will inform the review of the Central Car Park strategic site (Core Policy 21) and as a strategic policy it is a matter for the Local Plan to review.

However, we will also consider any other relevant evidence from the Town Centre and Retail Study that has been updated and progress made on delivery of the site. Clearly the CAF and the Salisbury River Park Masterplan may also have a bearing on the review of this strategic policy.

I appreciate that this is a long list of questions, but the NDP must be properly aligned to the emerging policies and we must understand all these contingencies in drafting our documents. I'm sure that you will agree. Since your LPR is now so advanced, I hope that you have all this information to hand.

I will be on holiday in August but I will check my emails regularly should you have any queries or difficulties.

We would be grateful to have your response in time for our September 14 Steering Group. That gives you 2 months to prepare the response which I hope is sufficient.

Thank you in advance for your assistance.





Mr S Fox Corporate Director for Place Wiltshire Council Trowbridge Wilts

14 May 2021

Dear Sam,

We, the Salisbury Neighbourhood Plan Steering Group (SNDP SG), are writing to you collectively to call recent events to your attention in the hope that you can exert influence over your planning colleagues.

Thank you for the two productive online conversations with our consultant Andrea Pellegram and previous Chairman John Farquhar.

At your suggestion, we prepared a detailed Churchfields masterplan brief and a letter asking to work jointly with officers on this project and the SNDP site allocations. As you are aware, we were fortunate to receive £100 K grant towards the site allocation neighbourhood development orders and masterplanning support from AECOM. We expected, following our discussion with you, and the fact that planning authorities are required to support neighbourhood plans¹, that the planning authority would welcome our offer to work jointly and to benefit from the funding and support we have secured.

Yesterday, we had our first meeting with Jean Marshall, which was attended by Georgina Clampitt-Dix and Michael Kilminster. From our side, the meeting was attended by Kate O'Connor (our community housing lead also focusing on Churchfields) and Andrea Pellegram. Kate and Andrea expected to have a meeting to discuss the details of the masterplan brief and to agree joint working arrangements.

This is not what occurred, and to be frank, the meeting was very difficult. Jean questioned why the SNDP intended to address Churchfields, since it is a strategic policy, and said on more than one occasion that she would regret if the SG were to undertake a lot of work only to be opposed by the planning authority. This then caused great concern with Kate and Andrea who, again frankly, interpreted this as a threat that if the SNDP addressed Churchfields, there might be an objection from the LPA. This is certainly not what we felt we had agreed with you and we are disappointed that our overtures to work jointly have been met in this obstructive manner.

A second meeting is being sought between Andrea and Georgina and hopefully, in this meeting, the scope of the masterplan project will be agreed. AECOM is already in play and a meeting is arranged for next week..

A local planning authority must: take decisions at key stages in the neighbourhood planning process <u>within the time limits that apply</u>, provide advice or assistance to a parish council, neighbourhood forum or community organisation that is producing a neighbourhood plan or Order as required by <u>paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended)</u>. Paragraph: 021 Reference ID: 41-021-20140306



Annex 3: Letter from steering group to WC Corporate Director of Place, 14 May 2021

The reason that we are writing to you now is that, despite your input, we feel that we are still being warned off the Churchfields topic for the NDP and indeed, there was only lukewarm interest in our site allocations.

With regard to the strategic policies in the Core Strategy for Churchfields, we see that a masterplan was required by the policy. No masterplan has been produced by the LPA. No indication was given in the meeting that the LPA intends to prepare a masterplan. Nor, we have learned, is the 1100 dwellings in Core Policy 20 for Churchfields being included in the housing supply calculations for Salisbury in the LPR. We therefore wonder if it is necessary or correct at this stage to consider Churchfields as a strategic allocation.

The SNDP SG and the LPA need to work together to agree an outcome where emerging strategic policies (which may not be appropriate in the LPR) and emerging SNDP policies are mutually supportive: where the LPA identifies the strategic context and the SNDP adds local detail. The SNDP's main objectives are to reduce traffic harm in the central area and increase affordable housing provision. Surely, these are matters of equal concern to the LPA

Let us be clear, we cannot succeed without WC LPA officer support and look forward to you ensuring this can be provided.

Yours sincerely

Katharine O'Connor, Mark Stevens, Jamie Hobson, Margaret Willmot, Hans-Dieter Scholz, Cllr Atiqul Hoque, Cllr Thomas Corbin, David Wilson, Louis Hodgkinson, Nicola Lipscombe,

Salisbury Neighbourhood Plan Steering Group

Salisbury City Council The Guildhall Market Place Salisbury Wiltshire SP1 1JH Tel: 01722 342 860 email: info@salisburycitycouncil.gov.uk www.salisburycitycouncil.gov.uk



Annex 4: Report on community consultation, Autumn 2021

Report and Update for the Community about the Salisbury Neighbourhood Development Plan's Community Engagement work in September and October 2021

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Doc 84578



Introduction

This report has been prepared for people who live in, work in and visit Salisbury by the Vice Chair (Councillor Chris Stanway) of the Steering Group and a community member (Kate O'Connor). The Steering Group is responsible for helping Salisbury City Council complete a Salisbury Neighbourhood Development Plan (NDP).

You can find more information about the Steering Group and the SNDP on the <u>Council's website</u> where there is a designated section for Neighbourhood Planning.

Background Information

In early autumn 2021 we conducted our first consultation since 2019 when detailed work first began on the Plan, which covers the parish area that Salisbury City Council is responsible for. This recent consultation was not about everything that the NDP will contain. Instead, it looked at four sites that might be allocated for potential development in the NDP by early 2022. We expect to conduct formal consultations on the NDP after the New Year which will follow nationally prescribed rules.

The four sites we asked you about are:

- Coldharbour Lane
- Quidhampton Quarry
- Brown Street Car Park
- Churchfields Trading Estate (3 sites within or next to the Estate).

Our proposals concern land for housing, the kind of housing on that land and the benefits the "community" as well as new residents should obtain from any development of that site. By July 2021 we felt we should informally assess how the community were likely to view proposals for site allocations. We did not wish to leave this until the last minute!

An NDP Site Allocation allows a community to specify how a defined site might be used if:

The site owner decides to change the existing use and undertake detailed planning work- or to sell to someone else to do that. The owner is not obliged to change the existing use.

The NDP completes all legally required work to prove that what is proposed can be justified.

The community votes in favour of the NDP as a whole. The NDP will have a range of things for consideration as well as site allocations.

A Neighbourhood Development Order (NDO) is a separate legal process. Not all NDP sites need one. It requires more detailed work e.g. studies about flooding, bats, etc. If Wiltshire Council, as our Planning Authority, is satisfied that our work has been satisfactory the community can formally adopt the NDO – but only after Salisbury City Council runs a one-off referendum for that site.

An adopted NDO is the equivalent of outline planning permission. Again, the site owner has more planning work ahead. However, if they do not wish to develop the site in line with the NDO they can leave it undeveloped.

We expect to be giving you more information in 2022 about the NDP and any NDO referendums (who runs them, who votes etc).



July to Now

Since July, work has continued with a variety of partners. Our four sites are different and need to be treated differently. Where we can, we will try in future to consult about each site on its own.

We will also learn lessons from this first consultation, which demonstrated the need to be specific about ideas taken from developments outside Salisbury.

We clearly worried some people that we might be considering a multi-storey building on Brown Street Car Park. Rest assured we do not - but we understand why this caused confusion and apologise for it.

Wherever possible, we will only use specific materials about the site in question. That should be easier because of the detailed work now being done.

What you told us is set out in 4 Appendices, so you can read about 1 or 4 sites.

Reading them all may help you understand what we need to consider and the wide range of opinions and ways of looking at site allocations. You will see that people commented on other things. Many worried about "overdeveloping" Salisbury.

You can find the original report of the On-Site Survey on the SSC website – we used it to help prepare this feedback. HYPERLINK

Site allocations and NDOs - looking ahead

The Steering Group expects to decide about the site allocations soon. This involves weighing up the case for each possible allocation – pros and cons.

We have Government funding for work on NDOs for Coldharbour Lane and Brown Street Car Park and continue with work on these.

We expect a further NDO consultation about Coldharbour Lane soon.

Brown Street needs more work on potential NHS and other uses of part of the site. We will also be undertaking a focused car park study at Wiltshire Council's request.

Subject to further funding there may be scope for a third NDO for part(s) of Churchfields. In the meantime, we commissioned a draft Government funded proposed masterplan and design guide for the estate which we will discuss with Wiltshire Council and others. We also plan a specific consultation exercise with people who work on the estate or own land there to discuss this.

We are not planning an NDO for Quidhampton Quarry. The owners are entitled to make an application for planning permission with or without an NDP site allocation.

We aim for the Steering Group, subject to Covid, to complete and approve a draft NDP no later than mid-January 2022. The Group will then table the NDP and supporting papers to Salisbury City Council.

The City Council will be asked in March 2022 to approve a "Regulation 14" consultation lasting 6 weeks. Regulation 14 means that the City Council consults everyone who lives, works, and carries on business here about the draft NDP and its supporting papers. There will be discussions with other interested parties as well.



NDOs go through a similar process.

We will make public what we are doing at all key stages.

Quidhampton Quarry Event 3rd November 2021

You may know that we held a "one-off" event after extensive leafleting of roads near Quidhampton Quarry. There was a good and lively turnout. Visitors met members of the Steering Group, councillors and the site owners' planning and transport consultant. This was led by a ward councillor.

The owners' consultants have been given access to all written comments and will respond to the Steering Group about these at the proper time.

Discussion ranged from building designs to making the site and planned paths fully accessible for people with disabilities.

There was particular interest in road access and sustainable transport.

Thank you to those that came to face-to-face events, gave written or verbal feedback, completed a survey.



Appendix 1

Coldharbour Lane

75.32% supported this in the online survey – it was most favoured of the 4 sites consulted upon. 154 made comments. We took a closer look at 93 supportive comments and 35 specific objections.

A substantial number like or love the proposed use of the space given that it is brownfield, where it is located and PROVIDING it is truly affordable AND remains affordable.

"Great to see 100% affordable housing and for older people who cannot afford to rent and run elsewhere. A nice location too."

"I like this proposal and think it could form a lovely community."

We had many practical comments/observations about the specific things that should be considered such as greening the site, carparking and other practical matters.

We have shared all comments, supportive or not, with the architect and the housing team working on what might be built and why. We have been closely involved in their key meetings and this will continue. All comments help.

Anyone reading the full report on the online survey will see that there are Salisbury concerns about:

What sort of housing is needed and if it is needed at all?

"Overdevelopment" in favour of older people and uncertainty about how to best tackle that. That applies even where people otherwise think development of affordable housing for older people is a good use of this site. It also applies to every site we asked about.

The NDP is paying particular attention to all this (although it is about much more than sites and housing).

Two people commented on assumed poor quality of design and complained about planning jargon being used. Our initial sketches were prepared for preliminary use with a range of people including people who currently live in a similar development. However, sketches and plans used in a next round of community engagement will be much more explicit about what might be built on Coldharbour Lane to ensure a "Salisbury" development. We will avoid jargon where we can.

6 comments focused on risks of flooding, contamination and the belief that the site should be green space in future. The site can only be developed if proposals demonstrate that flooding and contamination matters will be properly dealt with. That appears possible. It is unlikely though that the site owner/any future site owner would agree to decontaminate the site for a dedicated green space. The Neighbourhood Development Plan would also find it difficult or impossible to justify proposing such a policy given close access to existing green spaces.

8 comments outline concerns about Salisbury infrastructure, roads/traffic and parking generally or specifically. Detailed work is under way to ensure that this potential development addresses the local aspects of such concerns. We have also paid close attention to the needs of future residents on such a development for affordable/sustainable transport and parking arrangements.

Remaining adverse comments focus overwhelmingly on convictions that:

Salisbury is over developed,



There is too much housing for older, richer people,

We do not require more housing,

If we require more housing there is already plenty for older people - younger people must be given absolute priority,

There is not enough space at this location and similar.

Most people attending a face-to-face event also favoured the potential use of Coldharbour Lane for 100% affordable housing for older people. Written and verbal comments were remarkably like those provided via the online survey. There were similar concerns about development and so on. Also, similar differences of opinion.

We had helpful comments from people with sentimental connections to the gasholders site or a particular fondness for this part of Salisbury.

We think it will be possible to satisfy people in the NDP that there is a real need for affordable accommodation of a good standard for older people in Salisbury. Also, that this site is suitable for that purpose.

The whole Plan must convince an independent examiner as well!

Appendix 2

Churchfields Estate



56.9% of people completing the online survey supported this proposal and it was 2nd in popularity terms. 144 offered comments and we looked closely at 82 in favour and 62 concerned/opposed.

A distinct majority expressed favourable opinions such as:

"The Engine Shed is a good idea for development."

"A good opportunity to upgrade Churchfields for both business workers and residents."

"It might help to reduce traffic pollution."

"Opportunity to 'green' the site."

This was tempered by caution about possible contamination of the Old Engine Shed, potential river pollution and increased flooding risks. Much more information was asked for, with a query about whether Wiltshire Council has alternative suggestions.

There was distinct weariness with "yet another plan which will never come to fruition" and "Churchfields has been promised regeneration for a MANY A YEAR".

Specific issues were flagged:

"Expectation of working from home is not a healthy social policy."

"Poor access to amenities e.g., surgeries."

Job creation needed before ... new housing."

It is the case that redevelopment of Churchfields has been considered for some years and is covered by **the Wiltshire Core Strategy adopted in 2015.** That allocated Churchfields as a mixed-use development site for 1,100 dwellings with 5 hectares for employment. **The Central Area Framework (CAF) approved by Wiltshire Council in 2020** suggested a shift in priorities.

The forthcoming **Local Plan Review** which included a round of county wide consultation between January and March 2021 requires Wiltshire Council to confirm a strategy for Churchfields together with more detailed plans. They will need to consult further on this at key stages. We hope that the strategy and plans will complement the work of the CAF, encourage regeneration beyond the city centre and help satisfy community aspirations for this key area. We hope that the masterplan and design guide will do the same.



Appendix 3

Quidhampton Quarry

52.3% of people completing the online survey supported this proposal. It was 3rd in popularity terms. 172 offered comments. We looked closely at 90 in favour and 82 concerned/opposed.

"This is a good proposal to provide extra housing in a wasted site, close to facilities, yet will not spoil the landscape surrounding Salisbury."

"With care given to landscaping and affordable housing it would be an asset for the city."

"Please make sure the estate has good links by bus and for walking and cycling. Very exciting if it is pulled off correctly."

Not all responding were residents of the Salisbury Neighbourhood Development Plan area - we found their input helpful, though. We appreciate that for Wilton and Quidhampton Parish Councils this site will be - and is - of interest.

Many neither supported nor opposed development of the site. Support was usually conditional, e.g. only IF all housing was to be truly affordable. Detailed work continues to establish whether the Steering Group can support an allocation of the site. If we support it, it will be because Salisbury will gain affordable housing on a brownfield site and a development likely to meet other aspirations for specific benefits.

Observations were made about things that should be considered whether people were for or against the proposal. Concerns included infrastructure, traffic, overdevelopment in general, and cynicism about "affordable" housing often being no such thing for people needing to rent or buy.

There were numerous comments in favour of using brownfield sites, NOT greenfield sites, throughout this community engagement, in the online survey as a whole and for this site. Again, not all agree. There was confusion over whether this is brownfield (it is, in planning terms and practice). We are sorry this was unclear.

Some commented about the perceived quality of layout, design, and facilities.

Also important was how Salisbury and Wilton affect each other. Will developing this site improve or worsen that? How might this affect people in Quidhampton Parish? Co-location with Bemerton Heath was most critical.

People made comments about the planning history of the site, how the site should be used as a result or as a better alternative to other possibilities in Salisbury.

We are sharing all comments/observations with Wiltshire Council as Planning Authority, and with Wilton and Quidhampton Parish Councils. We have already copied in the owners of the site and their planning/other consultants.

Some points such as limited access have been known about for years and have been kept in mind when working on the emerging NDP. We will only support this site allocation when we are satisfied that there is a realistic possibility of that being dealt with. We think this might be possible. Every comment helps. Thank you.

What are important are the planning rules that Wiltshire Council and the Neighbourhood Development Plan must both consider. We may not rule out all development, especially prior to



specific proposals being taken through the planning system. At that point specific claims e.g., poor design or the wrong kind of housing can be considered if there is supporting evidence to back the claims.

To sum up, both councils must respect planning law and rules. Both must focus on the actual evidence for and against a site or indeed a particular development.

The dedicated session, primarily for residents of Bemerton Heath, on 3rd November explored up-to-date ideas about the Quarry. The owners' planning consultants were able to talk through what they are doing. Comments about that and/or the whole NDP process have been especially helpful.

People attending any face-to-face event were curious about the detail, sometimes for/against or open to persuasion. The same applied in the online survey.

Those who were enthusiastic particularly liked the potential for an exciting new "green" development that would be "different" AND have affordable housing for younger people.



Appendix 4

Brown Street Car Park

61.9% of people completing the online survey did NOT support this proposal. 168 offered comments which we have considered carefully.

We recognise that more than 20 were particularly worried about what sort of designs might be proposed. Or that we might consider a wholly inappropriate development in a valued part of the city centre. We confirm that we would NOT support a development breaching the fine views of the Cathedral or one that did not respect the historic Chequers where the car park is located.

A Neighbourhood Development Order should increase the potential for some fine master planning of the site and encourage excellence in design and respect for the site's location and surroundings.

The CAF (2020) identified this car park as suitable for development.

The loss of any car parking from Salisbury or this specific car park was the single most important issue for many. Claims were made that we do not have ENOUGH car parking, or we have FAR TOO MUCH.

Where people thought that this car park could be redeveloped, they advised us to consider amongst other things:

Opening the privately owned New Street Car Park 24/7 - it's a convenient and central location.

Refurbishing, possibly staffing, Culver Street Car Park, which has access from the ring road and providing much needed electric vehicle charging there.

Making Culver Street much more acceptable to users – although not all agreed that this was possible or indeed necessary.

Improving the Park and Ride – longer opening hours were often mentioned as key.

More active travel options (cycling, walking, bus combinations).

Electric Park and Ride buses helping to reduce pollution and noise.

Clarifying car parking intentions for the Central Car Park, probably upgrading some or all of it.

The need for an agreed car parking strategy.

Parking issues revolved around convenience, safety, ease of shopping, location for this side of the city, lighting levels, overdue improvements for walking and cycling, overdue improvements for bus services, HGVs.

There was a strong emphasis on good parking provision (especially for the disabled) for new occupants of any kind.

"We need parking in the city" or "Are cars really more important?" There is no agreement, yet. This will be a key issue for further work.

Face-to-face or in the online survey, what many wanted was to see brownfield, not greenfield, sites developed, especially where there are services and facilities that people need and where there is employment. Brown Street was a classic site.



"This wouldn't ruin the countryside as it's in town already."

It was also thought to be an ambitious development that might be beyond our reach. There could be no guarantee that NHS services would in fact be located here, that housing would remain affordable, or that a development would be cared for over time. Design also featured here, as did a fully green building.

However, there WERE some very positive responses if the community secured NHS services and affordable (for younger people) housing.

"What's not to like about some decent NHS/GP facilities where patients might like them to be. Or even the GPs?"

Many were strongly attracted by greening the site and reducing the amount of car parking, traffic, and pollution identified with both. This links to improving the attractiveness of Salisbury to visitors and younger people (especially if combined with central affordable housing).

However, some worried that this might be greenwashing or that more green space may NOT be needed after all.

Those who favoured making this part of Salisbury greener thought it would help with sustainability and improved mental wellbeing. It would be attractive to younger people, existing residents and visitors.

"A potentially stunning environmentally friendly building."

What are we going to do now with everyone's comments and suggestions?

Our plan is to share and discuss all this with the people currently working with the Steering Group on its draft NDP.

We believe that even if Salisbury allocates the site and voters say yes, Brown Street Car Park will be a car park until mid-2024.

There is time to work through managing car parking and transport options. There is more to do on all aspects of any future redevelopment.



Annex 5: Letter from WC regarding site allocations, 18 October 2021

Wiltshire Council

18 October 2021

Annie Childs City Clerk Salisbury City Council The Guildhall Market Place Salisbury SP1 1JH Place Directorate Wiltshire Council County Hall Bythesea Road Trowbridge BA14 8JN

Dear Annie

Salisbury Neighbourhood Plan: Consultation on proposed site allocations

Wiltshire Council is grateful for having had the opportunity to input into your consultation on proposed site allocations for the emerging Salisbury Neighbourhood Plan ahead of the formal Regulation 14 consultation on the draft Plan. Thank you for agreeing to an extension of time.

Below, the principles to be considered in appraising the potential of the proposed site allocations are addressed in turn. An Appendix is also provided with highways and transportation information. As a general point, it will be important that all site proposals within the draft plan are backed up by willing landowners and viability is considered to help demonstrate that they are capable of implementation. Wiltshire Council's views as landowner are included within the response where relevant.

Brown Street Car Park

Paragraph 5.117 of the Wiltshire Core Strategy identifies 'Brown Street' for 15 dwellings as one of a number of central area regeneration sites in Salisbury and Appendix D recognises that policies of the former Salisbury District Local Plan that promote the site for mixed use development continue to be 'saved': Policies E5 'Employment (Brown Street Car Park)', H6 'Housing (Brown Street Car Park)' and S5 'Shopping (Brown Street Car Park)'. More recently the Salisbury Central Area Framework (CAF) has been prepared, which continues to identify the potential of the site for regeneration (mixed use including residential) subject to car parking studies being undertaken due to its operational use as a car park. The CAF provides useful information to be taken into consideration. Advice has previously been provided on what a car-parking study might involve and is reiterated in the Appendix for completeness. We will need to have a clear understanding of impact on any loss of car parking on the local area and this will involve a parking survey of a wider area to be agreed as previously explained.

Proposals for this site would need to be carefully considered in relation to its location within the historic core of Salisbury City, and in particular Core Policies 58 'Ensuring the



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conservation of the historic environment' and 22 'Salisbury Skyline' of the Wiltshire Core Strategy. It is not clear how the 'biophilic' concept would fit with this.

Wiltshire Council as landowner

Should the site become identified as surplus to parking needs, following the required parking and transport analyses, the principle of redevelopment for suitable city centre uses including policy compliant affordable housing is supported.

Coldharbour Lane (former gasworks)

The site is not identified for any particular use in the Wiltshire Core Strategy but is within the defined limits of development for Salisbury where there is a general presumption in favour of sustainable development in line with Core Policy 2 'Delivery Strategy'.

Wiltshire Council is working with the former operators of the gas storage site to revoke voluntarily without compensation the Hazardous Substances Consents that relate to this site. Whilst the final decision on this is likely to rest with the Secretary of State, this is the process required to remove the need to refer any applications on the site to the Health & Safety Executive. The landowner approached the Council in November 2020 about the process and good progress is being made.

From flood mapping it appears that the entirety of the site is situated within Flood Zone 2 and parts of it in are in Flood Zone 3. There is a possibility that the flood-risk situation will change with the creation of the Salisbury River Park and associated flood defence work. This matter would need to be resolved before the site is progressed further.

If the site is capable of allocation it may provide the opportunity to support the development of accommodation for older people and facilitate relocation from other sites in the City, which could themselves be redeveloped for general housing.

Quidhampton Quarry (formerly 'Imerys')

This site is currently covered by strategic policy in the Wiltshire Core Strategy (Core Policies 2 Delivery Strategy and 20 Spatial Strategy for Salisbury) for employment use and is also allocated for waste uses as set out below. Even if the site were no longer identified for strategic employment uses through the Wiltshire Local Plan Review, the matter of the waste allocation would remain.

It is to be noted that Neighbourhood Plans cannot include development that is minerals and waste related (section 61K, Town & Country Planning Act 1990); neither can they include development that requires Environmental Impact Assessment (EIA), should this be the case. The proposed development, which is suggested to be more than 150 homes would likely need to be screened for EIA.



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An area of land within the former quarry is allocated in the Wiltshire and Swindon Waste Site Allocations Local Plan (2013). The area of land roughly equates to the footprint of the former mineral treatment works and is safeguarded for potential future waste use in line with Policy WCS4 of the Wiltshire and Swindon Waste Core Strategy. Policy WCS4 seeks to protect identified sites from development proposals that may prevent or unreasonably restrict the use of that site for waste management purposes. The proposed housing scheme would encroach on the waste site allocation and therefore be contrary to strategic policies of the development plan.

In 2017, planning permission was granted for a revision to the guarry restoration scheme to create a 'development platform' for future redevelopment opportunities and formation of a calcareous grassland slope using recycled material imported by rail. The railway sidings were recognised as a significant infrastructure asset to the site and provide a sustainable transport link for a potential future use.

The quarry and rail sidings are presently disused, and the restoration of the site is incomplete. Planning permissions remain extant for mineral extraction, the treatment works and associated railway sidings and subsequent restoration of the quarry (see planning application 16/05957/FUL for a useful summary of the relevant planning consents). As confirmed by Annex 2 of the National Planning Policy Framework, land that has been developed for minerals extraction, where provision for restoration has been made through development management procedures, is excluded from the description of previously developed (brownfield) land. This site is therefore not 'brownfield' as described in the information document.

Detailed comments on highway and transport matters are provided in the Appendix for this site. This considers the merits of the site in terms of access to facilities and amenities. A particular concern regards potential vehicular access, which has been considered from both Wilton Road (current access) and Western Way (proposed access). Both are considered to have significant challenges, although the access via Western Way is considered preferable - albeit notable third-party land constraints appear likely. As detailed in the further comments appended, both access choices will interact with the Strategic Road Network (A36), requiring upgrades that would be determined by National Highways; this will come with additional design and engineering demands which may be difficult to overcome.

The desire of the Neighbourhood Plan Group to recover and re-use the quarry is fully appreciated. This notwithstanding, as per previous discussions, this site is complex to bring forward - not least by virtue of the Basic Conditions that the neighbourhood plan will need to satisfy at examination. It is therefore considered that the Neighbourhood Plan is unlikely to be an appropriate vehicle for this site.



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Churchfields Industrial Estate

This site is covered by strategic policy in the Wiltshire Core Strategy (Core Policies 2 and 20). Wiltshire Council is reviewing the strategic allocation for Churchfields as part of the Wiltshire Local Plan Review.

Consistent with the CAF, consideration is being given for a revised policy to be formulated around the site's continued use and regeneration as an employment location. One of the main issues with the current strategic allocation is that it needs to be looked at holistically and provision made for the relocation of existing uses. Notwithstanding conflict with strategic policy, regeneration of parts of the site as suggested in the consultation material 'to kick start regeneration in Churchfields' has previously been explored by the Council but ultimately not considered to be viable. Information has already been shared to substantiate

The Churchfields Depot (Plot 3) remains a key operating location for numerous Council services, including the provision of essential waste and recycling collections for around 68,000 households located in the south of the county. To date, no suitable alternative location has been found, though a Depot Strategy is underway to review operational provision over the next few decades.

The Churchfields Household Recycling Centre (HRC) also remains a key facility made available to residents in the south of the county. Salisbury residents would be able to access the Amesbury HRC within a 20-minute drive, as an alternative site. However, the Amesbury site is not considered to be of sufficient size to meet fully the requirements of both Salisbury and Amesbury - neither is the site able to be extended or upgraded to meet that need. A new HRC strategy is being developed by the Wiltshire Council Waste Service to help inform future service provision, although this is in its early stages. To date no suitable alternative location has been identified, but it is anticipated that any new HRC strategy would help inform the optimal location and size requirement of future HRC facilities.

The Engine Shed site (Plot 1) has been vacant for many years. Whilst Wiltshire Council has no immediate identified operational requirement for the property, options for this site are under consideration. This site may have potential for other uses linked to the wider development of the area as set out in the CAF that includes land around Salisbury railway station, and housing may not be the best use. This is subject to ongoing discussions with relevant stakeholders.

Wiltshire Council as landowner

The consultation material identifies three sites in relation to Churchfields that it indicates are in Wiltshire Council ownership. While Plot 1 is owned by Wiltshire Council and relates to the Engine Shed, the nearby Plot 2 is not completely within the Council's ownership. It should be noted that the Engine Shed is a heavily contaminated site and may ultimately require grant funding to support delivery of any future use.



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Plot 3 includes the Churchfields Depot and Household Recycling Centre (HRC), which are in operational uses and required for the delivery of Council services. Any plans for the Council's landholdings at the Churchfields Depot and HRC will only come forward once the Council no longer has an operational need for the site or there is a business case that supports the relocation of the facilities to an alternative site.

On a closing note, Wiltshire Council will be glad to discuss further with Salisbury City Council matters that arise from the contents of this letter and, in particular, it will be useful to understand the position as regards the consideration of the use of Neighbourhood Development Orders in respect of Brown Street and Coldharbour Lane.

Yours sincerely,

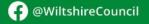
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@wiltscouncil



Wiltshire Council Response Salisbury Neighbourhood Plan: Consultation on proposed site allocations (October 2021)

Appendix: Highways and transportation information

This appendix should be read in conjunction with the letter of response by the Council to the above consultation, which sets out the main principles regarding the site proposals.

Brown Street Car Park

- . A parking survey is essential to establish the current use, both in the daytime and the evening. The impact of the loss of parking needs to be assessed with a consideration of alternative parking options (see further details below).
- Footway improvements will be necessary across the site frontage and possible changes to Traffic Regulation Orders (on-street parking).
- A relaxation of the parking standards may be appropriate based on Policy PS6 in the Local Transport Plan (LTP) Car Parking Strategy, although it is likely that some parking will still be required.
- Internally, servicing, refuse collection and deliveries need to be accommodated.
- It is essential that a high-quality pedestrian route (DDA compliant, etc) is maintained from Brown Street to Catherine Street. It is not clear if a diversion of the existing walking route to the south is being proposed and if so, whether this will be sufficiently wide enough.
- The site should provide adequate levels of cycle parking as set out in the LTP3 Cycling Strategy. If cycle parking cannot be provided within the site (at ground level) then there may be the need to provide on-street cycle parking in a hangar.
- A Travel Plan would be required compliant with Wiltshire Council's guidance to include at least one electric car club vehicle and associated charging infrastructure, free bus tickets and cycle vouchers.

A Neighbourhood Development Order on this site or another would need to be supported by a Transport Assessment in accordance with:

Travel Plans, Transport Assessments and Statements - GOV.UK (www.gov.uk)

We would also need to understand the potential impact of redeveloping Brown Street Car Park on parking in the local area. Our Parking Services team can provide the following information for both Brown Street and Culver Street (as the probable alternative car park facility):

- Usage (ticket) data for 2019 (pre Covid) and current year split by month
- Permit numbers allocated and by type



The above information would need to be supplemented by a parking survey which detailed parking capacity and usage in an agreed survey area (i.e. to include Brown Street and Culver Street car parks). The survey would need to capture both day and evening use (to capture evening economy use and by residents). The actual details of the survey would need to be agreed with the Council at the appropriate time.

Ultimately, the results of the survey should be collated and incorporated into the Transport Assessment (or as a separate Car Parking Report), which includes full details of the parking survey, as well as a review of car parking demand and provision.

This should include:

- · Details of the proposed redevelopment (use, size, location etc.).
- Car parking facilities to be provided as part of the development.
- Details of car parking that will be lost as a result of the development and an
 assessment of displaced demand and what realistic alternatives there are to meet
 this lost parking/displaced demand (this will need to include an access/accessibility
 assessment of the alternative options).
- · An estimate of car parking demand of the development.
- An estimate of car parking demand that will have to be met off-site.
- Details of on-street parking facilities, public car parks, parking restrictions, residents parking, pay and display parking facilities etc. within the survey area.
- Full details of the parking survey results, including details of existing parking demand and available capacity for each street and car park within the surveyed area, as well as an overall summary.
- A review of whether sufficient capacity/realistic alternatives is available to meet the demand of the development and the displaced parking.
- Details of any issues relating to parking identified (e.g. abuse of parking restrictions).
- Full details of the survey results (including photos and survey sheets).
- We would rely on flexibility in the planning policy to allow this to be more focused on purchase opportunities as opposed to dominance on rent.



Coldharbour Lane

- The site is served by narrow residential streets, some of which are one-way. Onstreet parking is within a residents parking zone (Mon-Sat 8am-6pm) evening and Sunday parking is unrestricted.
- We would expect parking in line with the Wiltshire LTP Car Parking Strategy although
 a reduction may be acceptable depending on use and available sustainable travel
 options. However, there is the risk that the site would lead to an increase in demand
 for on-street parking, which is already constrained. The sheltered / care home would
 require some staff parking. If a café is proposed, this could become a destination in
 its own right so parking may be required for this use also.
- The previous use did not generate much traffic (although currently being used to park post office vans). Any new proposal/application may need an assessment of the junctions onto the A36, depending on the scale of the proposed development.
- Internally need to consider access and turning for service and delivery vehicles.
- Marsh Lane is not highway. Negotiations would be required to facilitate a formal right for cyclists/vehicles to use Marsh Lane.
- There is no cycle route into the city centre from this location. Measures to reduce onstreet parking demand (i.e. car club vehicles) and introduce a sign-only contraflow on Coldharbour Lane (subject to feasibility) should be considered.
- A Travel Plan would be required compliant with Wiltshire Council's guidance to include at least one electric car club vehicle and associated charging infrastructure, free bus tickets and cycle vouchers.

Quidhampton Quarry

In order to provide appropriate guidance, the following text considers the access opportunities from both Wilton Road and from Western Way. This is to ensure that access opportunities from either transport corridor are understood and that the financial implications of delivering an access strategy can be appropriately considered.

Wilton Road (A36) Access Opportunities

The current access facilities onto Wilton Road represent high gradient slips with limited opportunity to accommodate all turning movements onto the main thoroughfare. The access arrangements are further hindered by insufficient access visibility, which would need to be assessed against Design Manual for Roads and Bridges to reflect the highway status as Strategic Road Network. With regards to the scale of the development, typically 300 dwellings represents the upper threshold for a single main vehicular access, providing that a separate emergency access can be achieved. It may therefore be concluded that the upper development threshold of circa. 400 dwellings should be served from two separate access points, which is not feasible with the current arrangement. At the lower threshold of 300 dwellings, it may be considered feasible for Penning Road to provide for emergency vehicle access, however vehicle access constraints to either Hazel Close or to Sarum Academy access may present a further land constraint to housing delivery. For these reasons, the



existing access arrangement and minor improvements thereof, are broadly discounted as a sufficient vehicular access strategy for the scheme. With regards to active modes, sole access connectivity to Wilton Road may not be considered adequate, given the relatively inhospitable environment that the heavily trafficked A36 presents to walking and cycling modes and hence connectivity to Penning Road, and improvements thereof, will need to be determined to ensure that a sustainable development can be achieved. With final regards to public transport accessibility, the A36 does provide for adequate bus service provision, however improvements to active travel access to bus stops will need to be enhanced, with bus stop infrastructure significantly improved.

In order to achieve a sufficient vehicle access strategy to the A36, the proximity of the rail line to the road dictates steep gradients to any crossing of the rail line and hence any junction facility will be required to increase the separation of any access junction to the rail line to reduce these gradients. This may be achieved through one of two major enhancements to the A36:

- 1) Relocate the A36 carriageway further to the south;
- 2) Provide access slips to the south of the A36, incorporating signalised junctions or right turn lanes as appropriate, and recross the A36 via a bridge at a grade level equivalent to sufficient height crossing of the rail line.

Both A36 access opportunities are considered significantly costly, with third party land constraints and out of scale and context to the proposed 300-400 dwelling development, thus significantly affecting financial viability.

Western Way Access Opportunities

As stated, the SNDP Development Sites Consultation suggests access may be achieved directly from Western Way, thereby removing the need to connect direct to the A36. This access option is preferable with regards to connecting the site to destinations by active travel modes, due to lower traffic profiles and improved infrastructure; however consideration beyond Penning Road will need to establish cycle route connectivity. With regards to public transport accessibility, it is noted that the site may connect to local service provision on both Rawlence Road and Pembroke Road to the east and like the A36 access strategy, the site may connect to facilities and services along Wilton Road with enhancements. Whilst service provision along the A36 are within appropriate walking distances, although gradients do present a barrier which will need mitigating, access to local services to the east are beyond a typical 400m walking threshold.

In this regard, any assessment of the development proposals will need to determine whether the A36 service provisions can accommodate all destination requirements and whether the service provisions on the adjacent estate roads are merely incidental; for clarity, the site density and location are inappropriate to generate enough demand to re-route a service into the site and ensure commercial viability. To ensure such a service could be provided, the internal roads should be constructed at an appropriate width of 6.2-6.5m as they approach the western boundary; any future ransom should be avoided by control of land to the boundary and alternative routes may be narrower to facilitate an improved streetscape.

With regards to general vehicular access to Western Way, the potential ransom for land access is reiterated. However, it may be considered feasible to achieve such an access, although this will need to address and accommodate the access demands of the adjacent electricity substation and the Bemerton Heath Harlequins Sports and Social Club; this will require one or both access routes to be accommodated in a single access route to Western Way, which will generate further land constraint discussions with third parties. At the access point to Western Way, it is noted that existing trees are within close proximity to the Social Club access road and these will need to be removed to accommodate a sufficient width access route. With regards to the width of the initial access route, it is advised that a



carriageway width of 6.2-6.5m is provided with appropriate parking controls. Whilst this may appear overly wide, it will provide for sufficient contingency should additional land around the quarry be developed, leading to potential connectivity to Golding Grove (etc.), Fugglestone St Peter, and the opportunity to run a bus service through the site; as per above, a standalone development of circa. 400 dwellings is not sufficient to accommodate a commercially viable service, but connectivity through to Wilton Park and Ride may prove significantly beneficial at some point in the future.

Beyond the initial connectivity to Western Way, it is noted that the local road construction appears to be laid tarmac, in poor repair, on a concrete base. Whilst such a construction is sufficient to accommodate the axle loading from the development, it is considered highly likely to present a significant noise implication, with the additional development traffic movements, for local residences. With consideration of this, the development scheme should be proposed with measures to reduce the noise impact of additional traffic on the road surface; such mitigation may represent a simple surfacing scheme.

At the end of Western Way, the road junction with Pembroke Road is presented as a simple priority junction, with Pembroke Road having the dominant priority. Whilst this junction is of sufficient design, with marginally restricted visibility to the north, capacity analysis will need to be undertaken to determine whether an alternative junction scheme, such as a roundabout, should be implemented; initial consideration of the junction results in a preference to maintain the current priority design, to maximise bus priority along Pembroke Road and alterations will be driven by the need to safely accommodate additional capacity demands.

Pembroke Road terminates at the east where it meets Roman Road at a mini-roundabout. Beyond the mini roundabout, Roman Road joins Wilton Road at a priority junction close to Skew Bridge. The combination of the mini roundabout in a network with the A36 priority junction raises capacity and accessibility concerns. Having reviewed initial strategic model outputs, it is considered likely that 'link capacity' between the two junctions will be exceeded towards the end of the plan period without additional development and the proposals are likely to exacerbate this. It should also be noted that the network/junction capacities are likely to far exceed design capacity, especially if the unfettered link capacity is already approaching saturation.

With this in mind, it is considered very likely that junction queues and delays will interact within the system and cause 'block back' which may have material implications for the operation of the A36.

With regards to mitigation and improvement, it is noted that the close proximity of Skew Bridge has a detrimental impact upon exit visibility (from Roman Road) to the west. Addressing the structure of Skew Bridge is not considered feasible at this time, due to implications for the rail line, traffic flows and cost viability, and hence it is considered unlikely that enhancements to the current priority arrangement could be achieved. In order to address the forecast issues at the junction, which may be exacerbated by the development, it is considered likely that a signalised system incorporating both the mini-roundabout and Wilton Road Junction may be necessary and such implementation will need to be weighed up against priority of movement along the strategic road network (A36) which will be directly considered by National Highways as network authority.

In terms of pedestrian links, the relevant ones are to Quidhampton / Salisbury city centre, Wilton Hill, Sarum Academy / Fugglestone, Bemerton Heath. These are considered to require: a toucan crossing over the A36 and improvements to Foots Hill to create a safe route to Quidhampton (and thus into Salisbury city centre); a shared path to be negotiated over Wilton Estate land to Wilton Hill; legal access and upgraded surface along Pennington Road (which is a private route); and a shared path through the sports field to the east into



Bemerton Heath (this link is indicated on the SNDP plan) to access the primary school and bus route there (the R1 to the hospital - a major employer).

A Travel Plan would be required compliant with Wiltshire Council's guidance to include at least two electric car club vehicles (one car and one van) and associated charging infrastructure, free bus tickets and cycle vouchers, etc.

Churchfields

Churchfields has been subject of consideration for redevelopment across 3 individual sites, both within and adjoining the industrial estate; these are described as follows:

- 1. This site is positioned in the south west quadrant between the railway line to the north, Cherry Orchard Lane to the east and Lower Road to the south.
- Site 2 currently accommodates a car dealership fronting onto Lower Road to the north and reflects a north west quadrant of the industrial estate as currently presented
- **3.** Site 3 is accessed via Stephenson Road from within the industrial park, positioned to the south eastern element of the estate with the River Avon providing the eastern boundary.

Overall, each of the sites are considered within reasonable proximity to the Town Centre, as represented by the end of Fisherton Street as it meets Bridge Street (alternative locations may be considered subjectively); the town centre is accessible following a 20 minute 1,600m walk. Whilst this is beyond the preferred maximum walking distance for a Town Centre, being 800m (Providing for Journeys on Foot, CIHT, 2000), it is acknowledged that there are intervening opportunities for food shopping, community, and medical facilities, all accessible from Wilton Road.

For educational facilities, Sarum Academy provides secondary education and is located 3200 m from site 3, thus representing the furthest distance to any of the sites. This distance is considered acceptable to the Department for Education guidance (i.e., within 3 miles) and pupils from the site would not be eligible for school transport; this statement is made on the likelihood that the routes to the school are considered sufficient in design and safety, which would reflect the urban nature of the local environment. Notwithstanding this, it is noted that local pedestrian infrastructure is narrow at 2m wide, with limited opportunity for off road cycling. For primary school education, Bemerton St John C of E primary school is within a 1600m walk, which lies within the preferred maximum of 2000m.

Access to the rail station is also considered satisfactory, being within a 1000m walk. Bus services are also within walking distance with the R8 service in close proximity, thereby serving the sites with an hourly frequency service.

Whilst the sites illustrate sufficient access to local amenities, it should be acknowledged that development of part of an existing industrial estate will conflict pedestrian and cyclist residential movements with high quantities of HGV movement from the retained industrial units. Whilst this may not reflect a material safety issue, it will make the local environment less inviting to carry out such modal trips and reliance upon the car is likely to be high. However, from a transport perspective the opportunity to accommodate residents close to employment of an industrial nature should not be dismissed, as typically this employment is positioned in out-of-town locations and is highly reliant upon employee car trips and this close proximity would go some way to offset this.



Finally, upon car access, the local roads currently accommodate the industrial uses of the locality and hence accommodate materially high HGV proportions. With this in mind, the additional car use from the site is not considered likely to generate and material detrimental impacts. However, it is acknowledged that local land uses do result in significant overspill of car parking, which can result in reduced highway capacity and increased inconvenience and this would need to be addressed.

With regard to other modes of travel:

- An improved walking/cycling route is required along Churchfields Road to connect these sites to the city centre, rail station and bus stops. Delivery of a shared path to LTN 1/20 standards along the frontage of site 2 would be a requirement.
- The bus stop locations on Churchfield Road would need to be reviewed. It may also
 be necessary to provide improved bus stop infrastructure (e.g. a shelter and RTPI)
 although this would need to be integrated into the designs for cycle/walking
 improvements.
- In order to deliver the route between the sites and the rail station, it will be necessary
 to relocate up to 30 residential parking spaces (on Churchfields Road east of
 Stephenson Road). Potentially some of these could be relocated to site 3 enabling
 better access from the site to the city centre and station, or parking demand might be
 reduced through provision of car club vehicles, etc.
- Residential parking is a significant issue in this area. The site may present the
 opportunity to implement a car-free development (i.e. no residential parking
 provided).
- A Travel Plan would be required compliant with Wiltshire Council's guidance to include at least one electric car club vehicle and associated charging infrastructure, free bus tickets and cycle vouchers.



Annex 6: Consideration of letter from WC to SCC dated 18 October 2021

Text from letter	APL comments	
Salisbury Neighbourhood Plan: Consultation on proposed site allocations		
Wiltshire Council is grateful for having had the opportunity to input into	The consultation referred to was not intended for WC as the LPA and a	
your consultation on proposed site allocations for the emerging Salisbury	landowner, it was a "temperature check" with the community to understand	
Neighbourhood Plan ahead of the formal Regulation 14 consultation on the	the strengths and weaknesses of the schemes so that the NDP policies could	
draft Plan. Thank you for agreeing to an extension of time. Below, the	take community views into account. On this basis, this letter can be	
principles to be considered in appraising the potential of the proposed site	considered as unsolicited.	
allocations are addressed in turn. An Appendix is also provided with		
highways and transportation information.		
As a general point, it will be important that all site proposals within the draft	This is not entirely true according to Locality. However, for clarity, the	
plan are backed up by willing landowners and viability is considered to help	proposals and landowners are:	
demonstrate that they are capable of implementation. Wiltshire Council's	QQ – landowners are willing and working with us	
views as landowner are included within the response where relevant.	CL – National Grid put the site forward at Call for Sites and most recent	
	letter, though not endorsing the proposal, states that NG wish to continue to work with the SNDP	
	BS - this site was proposed by WC (property) and is allocated by WC	
	planning (CAF)	
	Churchfields – we know that they don't support this policy, but they have	
	not yet seen our proposals so it is premature for them to form a view at this	
	stage.	
	On the matter of viability,	
	QQ – viability is up to the proposers to worry about and they have considered this so far	

Brown Street Car Park	CL – Locality and the architects will work on viability as a separate technical support package. BS – we understand the full requirements of the planning application because they have been supplied. There is nothing unusual. Churchfields - Viability will be an issue here because of land contamination but we will seek technical support on this from Locality once the masterplan is agreed by the SG.
Paragraph 5.117 of the Wiltshire Core Strategy identifies 'Brown Street' for 15 dwellings as one of a number of central area regeneration sites in Salisbury and Appendix D recognises that policies of the former Salisbury District Local Plan that promote the site for mixed use development continue to be 'saved': Policies E5 'Employment (Brown Street Car Park)', H6 'Housing (Brown Street Car Park)' and S5 'Shopping (Brown Street Car Park)'. More recently the Salisbury Central Area Framework (CAF) has been prepared, which continues to identify the potential of the site for regeneration (mixed use including residential) subject to car parking studies being undertaken due to its operational use as a car park. The CAF provides useful information to be taken into consideration.	This has been accounted for in the draft SNDP.
Advice has previously been provided on what a car-parking study might involve and is reiterated in the Appendix for completeness. We will need to have a clear understanding of impact on any loss of car parking on the local area and this will involve a parking survey of a wider area to be agreed as previously explained.	I have liaised with WC Highways and have a contact at Atkins (their transport consultant). I have asked for a quote for this work and Annie Child is aware. The need for this work was not included in the NDO grant because it was assumed that the work would be done by WC since it is their policy that they would undertake a parking study for Salisbury.
Proposals for this site would need to be carefully considered in relation to its location within the historic core of Salisbury City, and in particular Core Policies 58 'Ensuring the conservation of the historic environment' and 22 'Salisbury Skyline' of the Wiltshire Core Strategy. It is not clear how the 'biophilic' concept would fit with this.	This is a good point, but we are nowhere near the design stage at present and our architects will deal with this as part of the NDO process (not the site allocations in the NDP.)

Wiltshire Council as landowner Should the site become identified as surplus	WC supports this proposal.
to parking needs, following the required parking and transport analyses, the	
principle of redevelopment for suitable city centre uses including policy	
compliant affordable housing is supported.	
Coldharbour Lane (former gasworks)	
The site is not identified for any particular use in the Wiltshire Core Strategy	The proposal accords with Core Strategy policy.
but is within the defined limits of development for Salisbury where there is a	
general presumption in favour of sustainable development in line with Core	
Policy 2 'Delivery Strategy'.	
Wiltshire Council is working with the former operators of the gas storage	Helpful to know.
site to revoke voluntarily without compensation the Hazardous Substances	
Consents that relate to this site. Whilst the final decision on this is likely to	
rest with the Secretary of State, this is the process required to remove the	
need to refer any applications on the site to the Health & Safety Executive.	
The landowner approached the Council in November 2020 about the	
process and good progress is being made.	
From flood mapping it appears that the entirety of the site is situated within	We are working with Development Management and the EA on this – we are
Flood Zone 2 and parts of it in are in Flood Zone 3. There is a possibility that	aware.
the flood-risk situation will change with the creation of the Salisbury River	
Park and associated flood defence work. This matter would need to be	
resolved before the site is progressed further.	
If the site is capable of allocation it may provide the opportunity to support	WC supports this proposal.
the development of accommodation for older people and facilitate	
relocation from other sites in the City, which could themselves be	
redeveloped for general housing.	
Quidhampton Quarry (formerly 'Imerys')	
This site is currently covered by strategic policy in the Wiltshire Core	This is not accepted by either me (your planning advisor) nor the planning
Strategy (Core Policies 2 Delivery Strategy and 20 Spatial Strategy for	advisor for QQ (Terence O'Rourke). We will need to "unpick" this
Salisbury) for employment use and is also allocated for waste uses as set out	systematically with the LPA, but here is the nub of the argument (which I
below. Even if the site were no longer identified for strategic employment	have already set out in draft in the SNDP):
uses through the Wiltshire Local Plan Review, the matter of the waste	



allocation would remain. It is to be noted that Neighbourhood Plans cannot	Core Policy 20 has not been delivered and cannot be delivered. The rail
include development that is minerals and waste related (section 61K, Town	head is not enough to be transport access for a new business and as we
& Country Planning Act 1990);	know, new road access will be costly and unlikely to be viable for any
	commercial activities. I have concluded that Core Policy 20 cannot be
	delivered and is therefore out of date.
	WC argue that it should be a "strategic" policy – I don't agree. I'm seeking
	clarification from Locality on the difference between Strategic/Non-Strategic
	Core Policy 20 MUST have replaced the waste policy so we don't understand
	what this is about but in any event, there is NO apparent way for this site to
	meet the minerals and waste aspirations (I will leave this to the proposers to
	argue on their own behalf)
	On this basis, I'm not including minerals/waste policies but a housing
	allocation on a failed commercial allocation
neither can they include development that requires Environmental Impact	This is not true. NDPs cannot contain policies on SCHEDULE 1 EIA but they
Assessment (EIA), should this be the case. The proposed development,	can progress with SCHEDULE 2 (which is what this would be if it was EIA).
which is suggested to be more than 150 homes would likely need to be	We need to agree this with WC.
screened for EIA.	
An area of land within the former quarry is allocated in the Wiltshire and	As I said above, QQ and I don't agree with this approach and we need to
Swindon Waste Site Allocations Local Plan (2013). The area of land roughly	clarify this in writing with the LPA.
equates to the footprint of the former mineral treatment works and is	
safeguarded for potential future waste use in line with Policy WCS4 of the	More to the point (and omitted from this response), the waste policies are
Wiltshire and Swindon Waste Core Strategy. Policy WCS4 seeks to protect	VERY out of date and should have been updated as part of this LP review.
identified sites from development proposals that may prevent or	However, I have had confirmation in many letters, they have not intention of
unreasonably restrict the use of that site for waste management purposes.	updating this out of date policy. They therefore have a very weak case to
The proposed housing scheme would encroach on the waste site allocation	argue about minerals and waste.
and therefore be contrary to strategic policies of the development plan.	
In 2017, planning permission was granted for a revision to the quarry	This is incorrect. The planning permission has lapsed (and QQ have a letter
restoration scheme to create a 'development platform' for future	from WC confirming this). Therefore, the case can be made that it is not
redevelopment opportunities and formation of a calcareous grassland slope	possible to restore the site according to the minerals policies which, by the
using recycled material imported by rail. The railway sidings were recognised	way, we presume were overtaken by Core Policy 20 which also cannot be
as a significant infrastructure asset to the site and provide a sustainable	delivered.
transport link for a potential future use. The quarry and rail sidings are	

presently disused, and the restoration of the site is incomplete. Planning permissions remain extant for mineral extraction, the treatment works and associated railway sidings and subsequent restoration of the quarry (see planning application 16/05957/FUL for a useful summary of the relevant planning consents). As confirmed by Annex 2 of the National Planning Policy Framework, land that has been developed for minerals extraction, where provision for restoration has been made through development management procedures, is excluded from the description of previously developed (brownfield) land. This site is therefore not 'brownfield' as described in the information document. Detailed comments on highway and transport matters are provided in the Appendix for this site. This considers the merits of the site in terms of access to facilities and amenities. A particular concern regards potential vehicular access, which has been considered from both Wilton Road (current access) and Western Way (proposed access). Both are considered to have significant	QQ's transport consultants have confirmed that this is acceptable and achievable in principle. You have seen the correspondence on this.
challenges, although the access via Western Way is considered preferable - albeit notable third-party land constraints appear likely. As detailed in the further comments appended, both access choices will interact with the Strategic Road Network (A36), requiring upgrades that would be determined by National Highways; this will come with additional design and engineering demands which may be difficult to overcome.	
The desire of the Neighbourhood Plan Group to recover and re-use the quarry is fully appreciated. This notwithstanding, as per previous discussions, this site is complex to bring forward - not least by virtue of the Basic Conditions that the neighbourhood plan will need to satisfy at examination. It is therefore considered that the Neighbourhood Plan is unlikely to be an appropriate vehicle for this site	We don't agree and we will continue to seek clarification on this.
An area of land within the former quarry is allocated in the Wiltshire and Swindon Waste Site Allocations Local Plan (2013). The area of land roughly equates to the footprint of the former mineral treatment works and is safeguarded for potential future waste use in line with Policy WCS4 of the	I have already said, the WLP is very out of date and therefore weak in the planning balance. We can also make the case that the policy cannot be delivered based on past attempts to restore the site.

Wiltshire and Swindon Waste Core Strategy. Policy WCS4 seeks to protect identified sites from development proposals that may prevent or unreasonably restrict the use of that site for waste management purposes. The proposed housing scheme would encroach on the waste site allocation and therefore be contrary to strategic policies of the development plan. In 2017, planning permission was granted for a revision to the quarry	The site cannot reasonably be used for waste management purposes. This is the permission that lapsed. The proposal cannot be delivered in the
restoration scheme to create a 'development platform' for future redevelopment opportunities and formation of a calcareous grassland slope using recycled material imported by rail. The railway sidings were recognised as a significant infrastructure asset to the site and provide a sustainable transport link for a potential future use. The quarry and rail sidings are presently disused, and the restoration of the site is incomplete. Planning permissions remain extant for mineral extraction, the treatment works and associated railway sidings and subsequent restoration of the quarry (see planning application 16/05957/FUL for a useful summary of the relevant planning consents).	current economic climate and the policy is therefore out of date. They need to review the WLP.
As confirmed by Annex 2 of the National Planning Policy Framework, land that has been developed for minerals extraction, where provision for restoration has been made through development management procedures, is excluded from the description of previously developed (brownfield) land. This site is therefore not 'brownfield' as described in the information document.	Until we sort out whether the minerals policies are up to date, we cannot address this point, but I consider the site to be "brownfield". However, we can always describe it as "previously used" or "abandoned quarry floor".
Detailed comments on highway and transport matters are provided in the Appendix for this site. This considers the merits of the site in terms of access to facilities and amenities. A particular concern regards potential vehicular access, which has been considered from both Wilton Road (current access) and Western Way (proposed access). Both are considered to have significant challenges, although the access via Western Way is considered preferable - albeit notable third-party land constraints appear likely. As detailed in the further comments appended, both access choices will interact with the Strategic Road Network (A36), requiring upgrades that would be determined	We are aware and QQ are progressing as set out above.

by National Highways; this will come with additional design and engineering	
demands which may be difficult to overcome.	
The desire of the Neighbourhood Plan Group to recover and re-use the	Noted, but don't agree for reasons set out above.
quarry is fully appreciated. This notwithstanding, as per previous	
discussions, this site is complex to bring forward - not least by virtue of the	Perhaps they don't want us to progress this site because it exposes the fact
Basic Conditions that the neighbourhood plan will need to satisfy at	that they have been negligent and have not kept their minerals and waste
examination. It is therefore considered that the Neighbourhood Plan is	policies up to date.
unlikely to be an appropriate vehicle for this site	
Churchfields Industrial Estate	
	A general note – they have not seen the masterplan yet, so they are
	objecting based on what they think it might contain
This site is covered by strategic policy in the Wiltshire Core Strategy (Core	I specifically asked Georgina about whether WC were updating the policies.
Policies 2 and 20). Wiltshire Council is reviewing the strategic allocation for	She responded thus in her letter to us:
Churchfields as part of the Wiltshire Local Plan Review.	
	The Council is reviewing the strategic allocation for Churchfields as part of
	the Local Plan Review. We have spoken and communicated extensively about
	this site, so I won't repeat the detail here. One of the main issues with
	delivering the current allocation is that it needs to be looked at holistically
	and include the relocation of existing users. We have provided substantial
	evidence that has been shared in confidence about the viability of the site for
	housing, which was discussed at the meeting in July as well as the issues
	around freeing up Council owned land for reuse. However, we do appreciate
	that work is being undertaken by AECOM on behalf of the Steering Group
	and would welcome early sight of this to understand what it is showing.
	This is very interesting. They DID share a document with us – it required the
	FULL COMPULSORY PURCHASE OF ALL LAND IN CHURCHFIELDS. It was
	dated 2014 and it was concluded that this approach would not be viable or
	possible. However, the approach in this recent letter seems to still be using
	this approach when discussing "relocation of existing users". We are not



proposing the COMPULSORY relocation of users but the natural progress of sites as current occupiers move out and sell/lease their land holdings.

I conclude that this is a mis-remembering on WC's part and that perhaps they should review their 2014 document. There is a discussion to be had here.

Consistent with the Central Area Framework, as part of the Local Plan Review consideration is being given for a new policy to be developed around its continued use and regeneration as an employment location.

The masterplan refers extensively to the CAF.

As referred to above, in response to the recent consultation and as resolved by Cabinet we are undertaking further work to review the employment evidence underpinning the emerging Local Plan. This will include the assessment of supply of employment land at Salisbury and will take into consideration the role of Churchfields as an existing employment site and how this could evolve in the future. We will share with you, when we are able to any new evidence about Churchfields.

I shared the masterplan brief with WC but they have not consulted SCC on the review of employment evidence. Why not? SCC is a key stakeholder. So far, we have seen NO new evidence.

In preparing the Wiltshire Housing Site Allocations Plan, which was adopted in February 2020, it was recognised that the 1,100 homes proposed at Churchfields could not be counted towards the supply of land at the Principal Settlement of Salisbury to meet the Wiltshire Core Strategy requirement to 2026, as a result new sites were allocated to help meet the predicted shortfall. It would be helpful to understand the reason for your question about the 1,100 homes to provide any further explanation.

	This shows that Core Policy 20 failed. The next stage of consultation for the emerging Local Plan Review will be once the draft Plan has been prepared and is published, as such there is no opportunity to align engagement with your forthcoming planned consultation.
	No, the next stage of consultation is the Reg. 14 SNDP.
Consistent with the CAF, consideration is being given for a revised policy to be formulated around the site's continued use and regeneration as an employment location.	Yes, but this does not take account of key issues (mentioned in the CAF and Core Policy 20) such as:
	Need for affordable housing
	Need to help small start ups (our live/work units)
	Air pollution
	Severance in city centre due to HGV traffic
	Need to add greenery in Churchfields
One of the main issues with the current strategic allocation is that it needs to be looked at holistically and provision made for the relocation of existing uses.	This is their old way of thinking. The transition can occur naturally which is what we are seeking in the masterplan.
Notwithstanding conflict with strategic policy, regeneration of parts of the site as suggested in the consultation material 'to kick start regeneration in Churchfields' has previously been explored by the Council but ultimately not considered to be viable.	They have never given us any evidence of this consideration. I don't think they have done this.
Information has already been shared to substantiate this.	If this is a reference to the 2014 study, they need to reconsider what it actually said.
The Churchfields Depot (Plot 3) remains a key operating location for	We can ask for nothing more, except perhaps, that the HRC study makes a
numerous Council services, including the provision of essential waste and	point of finding an alternative to Churchfields HRC. WC have many policies
recycling collections for around 68,000 households located in the south of	and text references in their documents that the HRC should be removed and
the county. To date, no suitable alternative location has been found, though	its transport implications addressed.



a Depot Strategy is underway to review operational provision over the next few decades. The Churchfields Household Recycling Centre (HRC) also remains a key facility made available to residents in the south of the county. Salisbury residents would be able to access the Amesbury HRC within a 20-minute drive, as an alternative site. However, the Amesbury site is not considered to be of sufficient size to meet fully the requirements of both Salisbury and Amesbury - neither is the site able to be extended or upgraded to meet that need. A new HRC strategy is being developed by the Wiltshire Council Waste Service to help inform future service provision, although this is in its early stages. To date no suitable alternative location has been identified, but it is anticipated that any new HRC strategy would help inform the optimal location and size requirement of future HRC facilities.

If the Waste Local Plan were up to date, it could have addressed this.

Did the HRC study authors remember that the Salisbury HRC should be moved? They did not consult SCC on the terms of the HRC study so we do not know. Should SCC request sight of the HRC study terms of reference?

The Engine Shed site (Plot 1) has been vacant for many years. Whilst Wiltshire Council has no immediate identified operational requirement for the property, options for this site are under consideration. This site may have potential for other uses linked to the wider development of the area as set out in the CAF that includes land around Salisbury railway station, and housing may not be the best use. This is subject to ongoing discussions with relevant stakeholders. Wiltshire Council as landowner The consultation material identifies three sites in relation to Churchfields that it indicates are in Wiltshire Council ownership. While Plot 1 is owned by Wiltshire Council and relates to the Engine Shed, the nearby Plot 2 is not completely within the Council's ownership. It should be noted that the Engine Shed is a heavily contaminated site and may ultimately require grant funding to support delivery of any future use.

Laura Young (WC affordable housing with whom we are working on Coldharbour) has expressed interest in this site for affordable housing. If she is successful, we will work with her. Also, Locality funding for viability and contamination has already been discussed.

Recent announcement that money may be made available to release brownfield land so perhaps we could work with WC to decontaminate the site.

Plot 3 includes the Churchfields Depot and Household Recycling Centre (HRC), which are in operational uses and required for the delivery of Council services. Any plans for the Council's landholdings at the Churchfields Depot and HRC will only come forward once the Council no longer has an operational need for the site or there is a business case that supports the relocation of the facilities to an alternative site.

We understand and accept this.



On a closing note, Wiltshire Council will be glad to discuss further with Salisbury City Council matters that arise from the contents of this letter and, in particular, it will be useful to understand the position as regards the consideration of the use of Neighbourhood Development Orders in respect of Brown Street and Coldharbour Lane.

Yes, that would be nice!



Annex 7: Response from Terence O'Rourke to comments by WC regarding Quidhampton Quarry, 15 November 2021



Sam Fox, Corporate Director for Place Wiltshire Council

C/O Annie Child City Clerk Salisbury City Council

15 November 2021

Dear Sam

Salisbury City Neighbourhood Plan (emerging): Quidhampton Quarry

TOR is representing the landowner with regards to the Quidhampton Quarry site and has been asked to assist Salisbury Neighbourhood Plan Steering Group and Salisbury City Council in providing information relevant to its consideration as to whether to allocate the site for residential and community employment development in the Neighbourhood Plan (NP). We have been pleased to assist, noting that the principle of redeveloping the site (for employment and/or waste related uses facilitated by the creation of a development platform) has previously been established. We understand, both from the emerging local plan and NP, that the development need in the area is now focussed on residential need, further that Wiltshire Council cannot currently demonstrate a five-year housing land supply. Residential development would make effective and beneficial use of the former quarry, which has not come forward for either employment or waste related uses since the quarry ceased operating in 2009 and has not been restored.

Whilst we note the positive provisions of NPPF paragraph 122 b), encouraging support for alternative uses of allocated land, where contributing to meeting an unmet development need in the area, we would prefer to secure a residential allocation, with the support of the local community and in the context of the strategy for the wider community area, before proceeding to a residential planning application.

In this context, we did attend a local 'drop in' event run by the NDP Steering Group last week (see attached display board). Whilst almost all respondents supported the principle of developing the quarry site for housing, we acknowledge that concerns were raised about the challenge of securing a suitable access. However, our transport consultants are confident that a scheme can be designed that addresses the access issues raised, including highway/junction capacity and on-street parking. Assuming that this is the case, given the sustainable location of the site, its status and planning history, and favourable conclusion in the alternative site assessment work undertaken by the NDP Steering Group, support for the allocation should be given by Wiltshire Council.

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However, we understand that Wiltshire Council has concerns regarding the emerging allocation; The City Council shared with us your response to the proposed allocation (dated 18 October 2021) and has asked us to respond directly. I deal with each concern in turn, as sequenced on your letter.

As set out above, I can confirm that the proposed allocation is backed by a willing landowner (Quidhampton Developments Ltd) and that the landowner is confident that a scheme for 350 – 400 homes would be viable.

The current employment allocation of the site (Core Strategy, adopted January 2015, policies CP2 and CP20) is out of date and has not been delivered. We note that CP2 enables settlement boundaries to be altered through subsequent neighbourhood plans, and that 4ha of employment development will be supported at 'Former Inerys Quarry Salisbury' in accordance with the development templates at Appendix A of the Core Strategy. First, it is notable that CP2 does not explicitly preclude consideration of other uses (in the same way as development outside the limits of development is 'not permitted'), second the site has not come forward for employment uses as required within the first 5 years of the plan, and third Appendix A confirms:

"As a last resort, if the Council feels that the new evidence renders the site undeliverable, a new allocation or allocations equivalent to the Strategic Allocation will be considered through the appropriate development plan process."

Wiltshire Council has failed to comply with its own requirements, in that it has not engaged positively with the landowner to bring forward the development of what is described in the Core Strategy as a site in a sustainable location and 'previously developed land' (see page 299 of the Core Strategy). The NDP Steering Group has taken forward this engagement, through the development plan process; the allocation for housing, which would also deliver over 1 ha of employment/community use and facilitate home working through modern design and appropriate digital connection, is therefore in general conformity with the strategic policy position.

In terms of the Waste Core Strategy (adopted July 2009) and Waste Site Allocations Plan (adopted February 2013) both, in respect to this site, have been superseded by the Core Strategy. There is conflict between the plans, and the last plan to be adopted takes precedence. In any event, both plans are out of date, and Policy WSA1 of the allocations plan sets out the presumption in favour of sustainable development addressing the scenario of the plan becoming 'out of date', further, the plan identifies the 'former Imerys quarry' as a local scale waste site, not a strategic site; it's alternative use for housing would not undermine a strategic policy.

The NDP is not seeking to include development proposals that are minerals and waste related; the proposals are for residential/employment/community use, and any reengineering of the site necessary to achieve these uses is not a minerals or waste matter. Note that the current proposals work with the existing contours, with very little re-profiling.



The NDP can include development that might require EIA, what it can't do is grant planning permission for development that requires EIA (e.g. through a Development Order). If the NDP is likely to have significant environmental effects then it must be accompanied by a strategic environmental assessment, but in any event, the site was screened for EIA by Wiltshire Council on 4 July 2019 (ref: 19/0501/SCR) and, with regards to a development of 300 homes, the Council determined that EIA is not required. The increase in scale from 300 to 400 homes is unlikely to change this view, given that it crosses no other EIA screening thresholds and the impacts would be of a similar nature and scale.



In terms of restoration and the brownfield status of the site, as you reference, the minerals working could have continued until February 2042 under permission S.93.0758, and the various permissions for the Chalk Quarry do require restoration. However, restoration has not been implemented - correspondence with your Development Management Team in February 2021 confirmed that the latest restoration scheme (permission 16/05957/FUL, granted February 2017) has not been implemented and has expired. Quarrying operations ceased in 2009. because further mineral extraction is not viable (Imerys sold the site), following which all associated buildings/infrastructure were demolished. This provides a clear position of 'substantial completion'. This is over ten years ago, and the restoration condition has not been complied with. Whilst a legal view on this matter has not been taken, if there has been a breach in the condition requiring restoration, it is our view that the site is likely to be immune from enforcement. The site is previously developed, and is described as such in all of Wiltshire Council's development plans and associated evidence bases (including the latest SHELAA - noting that the 2017 document identifies the site as 'suitable' for the development of 388 homes).

The rail sidings are an asset if bringing spoil to the site, or potentially to assist in bringing construction materials to the site. The NP allocation does not preclude this use. Beyond that, the sidings may be required for access to the site (one of the options being considered) but at that point, if the site is developed for housing, there would be no sustainable/viable rail use of the sidings.

In terms of access to the site, technical work to date has confirmed that safe and suitable access can be achieved – a position of which your Highways team do not appear to disagree. Yes, there are challenges, but these challenges are not insurmountable. We are now working up a sketch scheme for a one-way loop access system through Western Way / Stanley Little Road, understand that Salisbury City Council may be prepared to facilitate access across its land, and have an initial scheme of improvement for the Roman Road junction onto the A36. Collectively, these can provide access to the site, and sufficient information has/is been/being provided in this respect to support the NDP allocation – the detailed plans and detailed capacity testing will be a matter for the planning application.

It is worth highlighting here that any proposals for the re-use of the site, be that employment, waste or residential, will face access challenges, arguably more so in relation to the former given the size of commercial/goods vehicles and/or waste transport, which again is likely to have a greater impact on adjacent residential amenity.



+

Finally, given the consideration by the City Council, housing need, requirement to make best and effective use of the site, also the established principle of its redevelopment potential, it would clearly be helpful to the NDP group to provide them with the confidence that Wiltshire Council will support their aspirations. It is unclear as to which of the basic conditions Wiltshire Council consider that the allocation would not meet. Certainly, the NDP allocation would be in accordance with the NPPF, would contribute to sustainable development and would be in general (not absolute) conformity with the most recent development plan (even though those policies are out of date), particularly when considering the definition of, and approach to the matter of, 'strategic policies' in the NPPG (ID 41-074-20140306 – 077).

We trust that this is a helpful response to the points in your letter and that assistance and support can be given to the allocation.

Kind regards

Managing Director

Jacqueline Mulliner MRTPI

Mullines



Annex 8: Letter from WC regarding Quidhampton Quarry, 14 December 2021



14 December 2021

Annie Child City Clerk Salisbury City Council The Guildhall Market Place Salisbury SP1 1JH

Jean Marshall Interim Chief Planning Officer County Hall Bythesea Road Trowbridge **BA14 8JN**

Dear Annie,

Re: Salisbury Neighbourhood Development Plan - Quidhampton Quarry

Wiltshire Council acknowledges receipt of your letter dated 15 November 2021. This further letter is in addition to matters already set out in the Council's letter of 18 October 2021, and we intend to do two things: i) reiterate policy as it relates to the above land parcel, and ii) articulate our position where we believe the contents of your letter to be inaccurate.

The Policy situation

The land parcel known as Quidhampton Quarry is currently covered by strategic policy for employment use in the Wiltshire Core Strategy (WCS, 2015, Core Policies 2, Delivery Strategy, and 20, Spatial Strategy for Salisbury). It will, in the first instance, be a function of the Wiltshire Local Plan Review to decide how to review policy in respect of the Quarry. Consultants are currently considering employment land need for the county, South Wiltshire included. They are also instructed to re-examine the need for current employment land. The results of such assessment are due in early 2022.

An area of land within the former quarry is moreover allocated in the Wiltshire and Swindon Waste Site Allocations Local Plan (2013). Said land is safeguarded for potential waste uses under policy WCS4 of the Wiltshire and Swindon Waste Core Strategy (WSWCS, 2009). Policy WCS4 seeks to protect identified land from development proposals that may prevent or unreasonably restrict the use of that site for waste management purposes. As with policy within the WCS, review of policy within WSWCS remains the competence of the relevant plan-making authority.

Given the above position it would not be appropriate for the Neighbourhood Plan to seek an allocation of this land at this stage until the review of the requirements as indicated above and the future needs of this site have been fully considered at a strategic level.



0300 456 0100









Your letter

The Council does not agree that waste policies, and we cite "have been superseded by the Core Strategy... and the last plan to be adopted takes precedence" since the two planmaking frameworks pertain to distinct land use categories, as provided for by national development plan legislation. In addition, whilst the Council does not concur that "both plans are out of date", we do recognise that less weight may be ascribed to provisions within them.

It is contained within national plan-making provisions that policy within Neighbourhood Plans must be in 'general conformity' with strategic policies in development plans in the authority's area (para 29, NPPF, and associated footnote 18). Moreover, to respond to the query at the end of your letter, 'general conformity' is one of the 'basic conditions' under legislation that Neighbourhood Plan provisions must meet to become part of the development plan (para 37, NPPF, and associated footnote 23).

Further, your letter cites from WCS (Appendix A), that "a new allocation or allocations equivalent to the Strategic Allocation will be considered through the appropriate development plan process". This would, in fact, seem to underline that a reviewed allocation of the Quidhampton Quarry site could only occur within a framework of 'equivalency' and 'appropriateness' i.e. that relevant policy review would remain the competence of the strategic plan-making authority, which is Wiltshire Council.

Whilst secondary to policy considerations in respect of the land in question,-EIA screening judgement 19/0501/SCR is acknowledged. What needs underscoring is that such a judgement was provided more than two years ago; it would appear from your letter that proposals, including the housing quantum, may have altered since 2019, meaning that the above would in any case need to be reviewed for robustness.

In conclusion

The Council would therefore like to remind Salisbury City Council that Neighbourhood Plans may not make provisions about minerals and waste-related development, which is normally dealt with by the relevant county planning authority, and considered 'excluded' for the purposes of section 38B(1) of PCPA 2004 and s.61K of TCPA 1990 as applied by s. 38B(6) of PCPA 2004.

Finally, we reiterate our understanding of the Neighbourhood Plan Group's desire to recover and re-use the Quarry. However, as we have underlined on several occasions, the policy framework underpinning the land needs to be observed. Against this backdrop we restate our willingness to discuss this matter further and work with you to ensure complementary Neighbourhood and Local Plans are produced.

Yours sincerely

Jean Marshall Interim Planning Officer Direct line: 01225 713313 sam.fox@wiltshire.gov.uk



0300 456 0100







Briefing Note – Leaders and SNDP SG

For meeting with Wiltshire Council Officers

18 January 2022



Introduction

In December 2021, Wiltshire Council provided draft Place-shaping Priorities for Salisbury. "Salisbury" in this instance is the wider Salisbury area and not Salisbury Parish which is the remit of the Salisbury Neighbourhood Development Plan (SNDP).

In its December 2021 meeting, the SNDP Steering Group briefly considered the place-shaping priorities and raised concern that these did not reflect the SNDP Vision. It was agreed that a meeting would be held in January 2022 to consider the wording of the priorities. The Leaders of the City Council met on 5 January 2022 to agree suggested modifications to the priorities. This was then discussed and agreed at the 11 January SNDP Steering Group meeting.

The Place Shaping priorities for the Salisbury area are of significant importance to the SNDP which must be in conformity with the WC Local Plan strategic policies in order to meet its Basic Conditions. The Place Shaping Priorities will provide the justification for the Local Plan's strategic approach and it is therefore desirable for the SNDP Vision to be aligned to the priorities.

This paper recommends changes to the proposed Place Shaping Priorities provided by WC officers and recommends adjustments to both them and the SNDP Vision so that the two sets of priorities are complementary and provide a "golden thread" from the Local Plan to the neighbourhood plan.



Table 1: current WC wording and suggested modified wording:

WC Place Shaping Priorities	Suggested rewording
Delivering opportunity sites, including The Maltings and the Railway Station, to ensure long-term city centre resilience	Using all opportunities to allow development growth and positive change on previously developed land whilst meeting the challenges of climate change and protecting Salisbury's green infrastructure.
Maximising the economy, notably key sectors, and realising Salisbury Central Area Framework measures to secure the city as a visitor destination	Maximising the economy on previously developed sites particularly in the City Centre and Churchfields by using flexible policies that encourage innovation and resilience and realising Salisbury Central Area Framework measures to secure the city as a visitor destination.
Conserving the historic landscape setting of Salisbury, notably in terms of the city skyline, and views to / from the cathedral and Old Sarum	Preserving Salisbury City's role in the surrounding natural and historic landscape, especially in terms of the city skyline, and views to/from the Cathedral and Old Sarum.
Maintaining separation and distinctiveness between Salisbury and Wilton, and between Salisbury and adjacent settlements, notably Ford, Laverstock, Old Sarum , Britford, Netherhampton and Quidhampton	Maintaining separation and distinctiveness between Salisbury and Wilton, and between Salisbury and adjacent settlements, notably Ford, Laverstock, Old Sarum, Britford, Netherhampton and Quidhampton
Expanding affordable housing provision, notably for key sector personnel and first-time buyers and supporting the accommodation needs of the elderly	Provision of much needed homes for young people who struggle to find suitable accommodation in Salisbury and also to meet the particular needs of an aging population.
Identifying suitable locations in the area to facilitate around ??ha of business growth that responds to needs	(include this in the second priority on economy)

Improving Churchfields such that it integrates better within the city, Facilitating land use change in Churchfields to maximise opportunities for particularly via measures that improve transport both within and around new homes and modern businesses while reducing traffic and other impacts the estate, and presents a more attractive location to a greater diversity of on the City Centre. businesses Facilitating the regeneration of the District Hospital site to underpin its key Facilitating the regeneration of the District Hospital site to underpin its key role within the life sciences sector and as a sub-regional University-level role within the life sciences sector and as a sub-regional University-level education and knowledge facility education and knowledge facility. Promoting health and wellbeing through development. Improving connectivity through engineering and transport infrastructure Providing infrastructure to improve air quality, flood resilience and improvements whilst tackling pollution impacts and improving flood connectivity resilience and.

Table 2: Revised Salisbury Vision in the light of revised WC priories

Revised WC Place Shaping Priorities	Revised SNDP Vision
Using all opportunities to allow development growth and positive change on previously developed land whilst meeting the challenges of climate change and protecting Salisbury's green infrastructure.	Sustainable development principles will be applied, including appropriate climate change adaptation and mitigation measures and biodiversity enhancement for new and existing developments.
	Multifunctional green infrastructure networks will link people to jobs, schools, leisure, services, transport hubs and the countryside. The city will be greener with more street trees and other planting, and greenspace will be

Annex 12. Letter from WC review of the Local Transport Plan, 28 April 2022

	designed and managed with people, biodiversity and landscape setting in mind. Community partnerships will continue to play an important role in maintaining and improving the city's greenspaces.
Maximising the economy on previously developed sites particularly in the City Centre and Churchfields by using flexible policies that encourage innovation and resilience and realising Salisbury Central Area Framework measures to secure the city as a visitor destination.	The city will thrive and continue to be a cultural hub, with a diverse demographic where all age groups are represented and with sufficient community infrastructure to meet its needs.
	Changed shopping and working patterns will have been accommodated in a flexible approach to regulation that will allow flexibility for existing businesses and a fertile environment for start-ups.
Preserving Salisbury City's role in the surrounding natural and historic landscape, especially in terms of the city skyline, and views to/from the Cathedral and Old Sarum and fostering and excellent built environment.	The city's high quality landscape setting and historic built environment, especially in the city centre, will have been enhanced and views of the Cathedral Spire safeguarded.
	The character and amenity of Salisbury's different neighbourhoods and character areas will be respected and enhanced to ensure a high-quality environment for all residents, workers and visitors.
Maintaining separation and distinctiveness between Salisbury and Wilton, and between Salisbury and adjacent settlements, notably Ford, Laverstock, Old Sarum, Britford, Netherhampton and Quidhampton	Salisbury City will retain its separate identity because green spaces between it and other settlements will have been preserved.
Provision of much needed homes for young people who struggle to find suitable accommodation in Salisbury and also to meet the particular needs of an aging population.	A range of affordable social and market housing will be created in accessible locations to meet the diverse needs of the entire community.

Annex 12. Letter from WC review of the Local Transport Plan, 28 April 2022

Facilitating land use change in Churchfields to maximise opportunities for new homes and modern businesses while reducing traffic and other impacts on the City Centre.	Churchfields industrial area will evolve into an innovative neighbourhood and employment area that maximises its proximity to the Railway Station and the City Centre and will have reduced traffic and pollution impacts on the rest of the City.
Facilitating the regeneration of the District Hospital site to underpin its key role within the life sciences sector and as a sub-regional University-level education and knowledge facility. Promoting health and wellbeing through development by making provision for primary and secondary health infrastructure.	Modern and accessible healthcare facilities will be available to meet changing demands and NHS requirements and will allow Salisbury to return to good health post-pandemic.
Improving flood resilience and connectivity through engineering and transport infrastructure improvements whilst tackling pollution impacts.	Water management will minimise flood risk, reduce surface water run-off, improve water quality and enhance the biodiversity as well as the amenity value of Salisbury's internationally important rivers and wetland habitats.
	The city centre will be largely car free, allowing for easy movement on foot and cycle and for those with mobility difficulties, and for access by public transport and blue light services. People will be able to move freely on foot and cycle between the city and surrounding countryside and air quality will be improved.
	Public transport serving Salisbury, including Park and Ride services, will be improved and better used. Enhancements will take full advantage of technological advances, providing improved accessibility for longer hours.



9 February 2022

For immediate release

Wiltshire Council clarifies position on Churchfields site in Salisbury

As Salisbury City Council (SCC) is currently consulting with the public and other stakeholders about its proposals for development at Churchfields, Wiltshire Council has clarified its position on the plans.

SCC's consultation will help inform and shape its emerging draft Neighbourhood Plan, which will be published for formal comments later this year.

All Neighbourhood Plans must conform to policies in the adopted Wiltshire Council Local Plan and cannot contain or duplicate strategic or high-level policies that are included in the Local Plan.

The emerging Salisbury plan potentially includes two contentious sites in the city — Churchfields and Quidhampton Quarry — and if these sites are included in the final draft plan, Wiltshire Council will object, as these sites are already part of the Local Plan. Ultimately the Examiner will determine the matter, but SCC is aware of this conflict and wishes to gauge public opinion on various elements of their plan prior to formal submission to Wiltshire Council.

Cllr Nick Botterill, Cabinet Member for Strategic Planning, said: "We have been holding constructive conversations with Salisbury City Council about its emerging Neighbourhood Plan and have advised we will object to the plan if the council continues to include strategic sites such as Churchfields as potential development sites.

"We do not think that some of the sites chosen are appropriate for housing development. We are currently undertaking a Local Plan Review, and that is the proper place to consider the future of strategic sites such as Churchfields and Quidhampton Quarry – and we should not look to pre-empt this process.

"However, we do recognise that SCC wishes to provide sites for housing and to gauge public opinion on many proposals within its forthcoming plan, but we have advised that SCC shouldn't be pursuing these two sites at this time.

"We would need to consider our response to any formal Neighbourhood Plan submission when it is made, but SCC is aware of our objections to these sites.

"We will continue to keep an open dialogue with SCC and work constructively together on the Salisbury Neighbourhood Plan."



Annex 12. Letter from WC review of the Local Transport Plan, 28 April 2022

28th April 2022

Annie Child

E-mail: achild@salisburycitycouncil.gov.uk

Cabinet Office County Hall Bythesea Road Trowbridge Wiltshire BA14 8JN

Our Ref: MM/LY/22243

Dear Annie.

You may be aware that the Council is about to embark on a review of our Local Transport Plan. That also means reviewing a range of policy 'daughter' documents, including freight, Road Safety and Parking.

Regarding the latter, we will need to look carefully at forecast parking demand and supply, which you will appreciate is a particularly sensitive issue in Salisbury.

Given that work is imminent, the Council has decided to resist any proposals for making alternative use of car parks until the outcome of the above work is known.

That is of course especially relevant in relation to Brown Street and Salt Lane car parks and means that the Council will not support proposals for their redevelopment. It is appreciated that this will have implications for the proposals within your draft neighbourhood plan.

Happy to meet and discuss further if you would find it helpful.

Yours sincerely

Cllr Dr Mark McClelland

Cabinet Member - Transport, Waste, Street Scene & Flooding

Direct line: 01225 718386

Email: mark.mcclelland@wiltshire.gov.uk











Annex 13: Request for clarification when parking study would be undertaken, from SCC to WC, 17 October 2022



Our Ref: Doc 84376

Councillor Richard Clewer
The Leader of Wiltshire Council
Wiltshire Council
County Hall
Trowbridge
BA14 8JN

17 October 2022

Dear Richard

Salisbury Parking Study

The development of the Salisbury Neighbourhood Development Plan (SNDP) by the SNDP Steering Group and Salisbury City Council has recently raised questions concerning car parking in the city.

The Central Area Framework (CAF) notes the consideration for future redevelopment of Brown Street car park for a mix of uses, potentially including residential, retail and hotel/tourism uses. The CAF also notes "Prior to any proposals to redevelop Salt Lane and/or Brown Street car parks a study should be undertaken to determine the city's overall parking requirement, including an assessment to determine the degree to which these car parks are used by local residents and by those attending events at Salisbury Arts Centre and other nearby venues".

We would be grateful to know when the study, to determine the city's overall parking requirement, will be take place. It appears to us that the need for this study is clearly understood and yet it has not happened. The City Council looks forward to supporting any public consultation on this matter.

Yours sincerely

Annie Child

pp.

The City Council Leadership Group



Annex 14: Copies of articles in the Salisbury Journal, 2022

From the Salisbury Journal 29th April 2022

PROPOSALS to redevelop a Salisbury car park into housing will not be supported by Wiltshire Council.

Last year, as part of the Salisbury City Council's Neighbourhood Development Plan, a consultation was launched to consider building a range of affordable and market housing on Brown Street car park, as well as The Quarry on Wilton Road and Coldharbour Lane.

It was previously reported that the Brown Street site is to be fully considered if a study confirmed it is no longer required for parking.

The proposal was met with a mixed response from councillors and residents, and now the county council will be rejecting further action until its review of the local transport plan is complete.

Describing parking in Salisbury as "a particularly sensitive issue", Wiltshire Council cabinet member for transport, waste, street scene and flooding Mark McClelland said that policy 'daughter' documents, including freight, road safety and parking, in particular forecast parking demand and supply, need to be reviewed.

In a letter sent to the Salisbury City Council clerk yesterday, April 28, and provided to the *Journal*, Councillor McClelland writes: "The council has decided to resist any proposals for making alternative use of car parks until the outcome of the [local transport plan] is known.

"That is of course especially relevant in relation to Brown Street and Salt Lane car parks and means that the council will not support proposals for their redevelopment.

"It is appreciated that this will have implications for the proposals within your draft neighbourhood plan."

Following the consultation, results in the new year showed that <u>plans for the Brown Street</u> <u>site proved the least popular</u> out of the suggested proposals, with 61.9 per cent of online respondents opposing.

<u>Wiltshire Council leader Richard Clewer</u> and <u>city councillor Atiqul Hoque</u> had also previously raised their concerns.

Councillors on social media including Cllr Hoque, Cllr Mary Webb and mayor of Salisbury Caroline Corbin welcomed the letter.



From the Journal May 2 2022

A CITY councillor has been left "surprised" by a letter revealing the county council's resistance to housing in Brown Street car park.

Another councillor feels a reduction to car parking fees should be priority at this stage.

Last year, as part of the Salisbury City Council's Neighbourhood Development Plan, a consultation was launched to consider building a range of affordable and market housing on Brown Street car park.

This was in addition to areas in The Quarry on Wilton Road and Coldharbour Lane.

Last week however, a letter was sent to the city council clerk, revealing that Wiltshire Council will not be supporting these plans until its review of the local transport plan is complete.

This includes reviews of road safety and parking.

The document sent to clerk Annie Child, written by and provided to the *Journal by* Wiltshire Council cabinet member for transport, waste, street scene and flooding, Cllr Mark McClelland, said: "The council has decided to resist any proposals for making alternative use of car parks until the outcome of the [local transport plan] is known.

"That is of course especially relevant in relation to Brown Street and Salt Lane car parks and means that the council will not support proposals for their redevelopment."

City Councillor Annie Riddle (Ind) said this letter of rejection caused her "surprise", following her "amicable chat" about the plans with the cabinet member.

Cllr Riddle, also Neighbourhood Plan steering group leader, said the authority must be "having a rethink", as its own Central Area Framework proposes housing on Brown Street, adding she "isn't convinced the council knows what it wants".

Wanting the plans to be guided by the views of residents, Cllr Riddle said: "Last week at a social event Cllr McClelland and I had an amicable chat about the plan's progress.

"The city council has promised the community volunteers who have devoted three years to this project that we will complete our draft proposals and then consult everyone in Salisbury on them, and be guided by what they think.



"If they don't like the Brown Street idea we will not pursue it. That's what I told Cllr McClelland.

"So I am surprised by the sudden appearance of this letter."

Needing council's support

Cllr Riddle added: "It appears to be a shot across the bows to deter anyone thinking of supporting the scheme, or perhaps to dissuade us from consulting on it.

"And legally speaking, without [Wiltshire Council's] support we won't be able to progress with a development. But all the people of Salisbury deserve a say in their city's future.

"Goodness knows, they have little enough say under the current, centrally-controlled planning system, and who am I to deny them what limited influence the law allows them?"

Mayor of Salisbury Caroline Corbin (Lab) welcomed the letter from Cllr McClelland, but believes for as long as the Brown Street site remains a car park, there needs to be a reduction in parking charges.

In a bid to improve footfall she said: "There should be low rates across Wiltshire which are the same.

"Why should a space in Devizes, Melksham or Amesbury be of less value than one in Salisbury.

"The idea of introducing a visit to Salisbury as some kind of magical experience for tourists has to meet the everyday usage of residents in its function.

"We need to ensure whatever reason you come to Salisbury for has desired outcomes."

Reduction to parking charges

"It is a feasible solution to charge much less per hour but have a flat rate across the county, meaning those who dwell here can feel relaxed and not overwhelmed by high charges and a shortened less relaxed trip," Cllr Corbin added.

On the topic of conducting a parking study, Cllr Riddle said: "It's all very well Wiltshire talking about [parking studies], but they've been saying that for years. And only a couple of months ago they told the neighbourhood plan team we'd have to conduct our own.

"I'm not convinced they know what they want."

From the Journal, August 14th 2022



THE leader of Wiltshire Council has once again slammed plans to transform a Salisbury car park into housing.

Richard Clewer, also councillor for Downton and Ebble Valley ward, says Salisbury City Council's proposal to change Brown Street car park into a residential area will "fall flat on its face", as it is not a "viable".

Last year, as part of the Salisbury City Council's Neighbourhood Development Plan, a consultation was launched to consider building a range of affordable and market housing on the site, as well as on The Quarry on Wilton Road and Coldharbour Lane.

It was previously reported that the Brown Street site is to be fully considered if a study confirmed it is no longer required for parking.

<u>Wiltshire Council formally announced its resistance to these plans</u> back in April, but Cllr Clewer says that, while Brown Street was considered in the Central Area Framework as a potential development site, he is concerned that the site continues to be an option within the neighbourhood plan.

The public can now air their thoughts on these proposals until the end of next month, September 30, as the neighbourhood plan enters a fresh consultation stage.

Then, based on feedback, a revised plan will be put forward for outline planning permission.

In a letter to Salisbury City Council, the county authority previously said it was resisting any proposals for making alternative use of car parks until the outcome of the local transport plan is known.

"It worries me that residents are being asked to consult on something that isn't viable," Cllr Clewer said.

"I just do not support this and despite our best efforts, it is still being put forward.

"[The council has] proceeded and we have tried to explain to them but they are focussed on getting it complete.

"It is not going to go through, it just isn't viable, when this goes in front of inspectors it will not be successful.

"My real concern is the public getting asked about it when it is going to fall flat on its face."

He added a "detailed parking strategy" is needed before significant changes can be made to parking in the city.



For more information and to take part in the neighbourhood plan consultation, click here.

From the Journal August 28th 2022

A senior Salisbury councillor has hit back at Wiltshire leader Richard Clewer for speaking out over a city public consultation.

<u>Cllr Clewer said last week a proposal for health facilities and affordable flats on Brown</u> Street car park was not "viable" and would "fall flat on its face".

The scheme is just part of the Salisbury Neighbourhood Development Plan, drawn up by a group of city councillors and community volunteers.

People are now being encouraged to share their views on it.

Cllr Annie Riddle, chair of the plan steering group, said: "I don't understand what Cllr Clewer is afraid of.

"We're not dictating to anybody. We couldn't even if we wanted to.

"All we're doing is asking people how they'd like their city to be in the future and suggesting some options. Every response will be taken into account, the outcome reported publicly and changes made as a result.

"It all has to be approved by an inspector after that, and by a referendum. We're following the rules all the way.

"But it can sometimes seem as if the powers-that-be at Trowbridge do not want Salisbury's citizens to have any independent input into what happens here, other than at a time and place and in a form of Wiltshire Council's choosing.

"There are 32 policies in this Plan, and only one of them is about Brown Street.

"It is vital that the voters of Salisbury are not deterred from registering their views on the whole range of issues. I trust their common sense."

Cllr Riddle, an independent added: "This is not a political exercise.

"My role is to represent the steering group, including members of all parties, and the volunteers who have contributed their expertise over three years.

"They've done their research on the need for this type of housing and medical provision. They've done a parking study, and there's plenty if Wiltshire would only make Culver Street more user-friendly.



"What's more, Brown Street is named as a potential development site in Wiltshire Council's own Central Area Framework." A link to the consultation is at <u>salisburycitycouncil.gov.uk</u>, and all the documents can be seen in the Library and Guildhall.