

Consultation Statement

Salisbury Neighbourhood Development

Plan 202-2038 (NDP)

PART 3: COMMENTS SET OUT AGAINST TOPIC/POLICY/DOCUMENT

Introduction

In this part of the Consultation Statement, individual responses are set against relevant topics/policies/documents. The table of contents (below) is hyperlinked so that individual policies can be reached (SHIPF/RETURN). Comments from the NDP SG made against representations are in [square brackets].

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INTRODUCTION

Each comment highlighted in Part 2 is considered here in Part 3 and an indication is made of how changes will be made in the NDP documents where this is considered necessary. Justification for not making changes will also be provided.

This part of the Consultation Statement considers each comment that raised matters material to planning were considered against each part of the NDP and supporting documents.

- Comments from Wiltshire Council are highlighted green in the heading.
- Comments from Statutory Consultees are highlighted orange in the heading.

Part 4 will show the text changes themselves.

GENERAL COMMENTS

A note on the comments received through the Commonplace website that are not material to planning:

The free text responses to the vision portion of the commonplace website were extensive, as shown in Part 2. The majority of the comments did not relate directly to material planning considerations but are nonetheless important to capture here.

*By far, and overwhelmingly, the comments that were not planning-related were about transport: traffic congestion, poor park and ride facilities, poor bus provision, parking, parking charges, poor linkages to the railway station, traffic severance, the lack of easy access to the town centre for people with disabilities and parents with young children (who found public transport impossible), and conflicts between motorists and cyclists. These are important matters that must be acknowledged in the text of the NDP and this will be modified to more accurately reflect these acute criticisms of Salisbury's built environment. This should also be addressed in the forthcoming **Local Transport Plan 4**.*

*A prevalent theme related to the recent significant strategic development of greenfield sites around Salisbury and how this has changed the character of the countryside and has added to traffic congestion, again due to a perceived lack of highways infrastructure improvements. There was a more general theme about the way that strategic housing development had been delivered in a manner where necessary infrastructure for health, etc was not provided, adding strain to existing infrastructure and just making life a bit harder for everyone. This should be addressed in the forthcoming **Local Plan Review**.*

Another recurring comment was a resistance to the relocation of the Library which is a matter for Wiltshire Council to address.

*Finally, the overall sentiment which was stated again and again was that the NDP went too far in seeking to reduce car usage in the centre of Salisbury and that parking should continue to be provided, particularly for shoppers, parents with young children, people who had difficulty walking and using public transport for whatever reason, and visitors. **The tenor of the NDP will be updated to reflect this strongly held view expressed by so many responders.***

Respondent name

Wiltshire Council

Respondent comment

Salisbury Neighbourhood Development Plan (Regulation 14) Consultation

Wiltshire Council consultation response

Thank you for providing Wiltshire Council with the opportunity to comment on the draft Salisbury Neighbourhood Development Plan, pre-submission, referred to henceforth as 'NDP'.

We welcome the publication of the draft NDP and the significant progress this represents.

Wiltshire Council has been advising Salisbury City Council and its Steering Group about the Neighbourhood Development Planning process. Advice and comments have been offered as ongoing dialogue throughout the process.

The Salisbury Neighbourhood Area, on which the Plan is based, was designated on 18 July 2019.

The comments that follow are made in the interests of helping to ensure that the draft NDP is in general conformity with the strategic policies set out in the Wiltshire Core Strategy and can be effectively interpreted by the Council in determining planning applications.

The representations received through the consultation will provide you with the opportunity to review the Plan and make any appropriate changes. At this point it is also worth reviewing the Basic Conditions, which a qualifying body should consider throughout the process of developing a Neighbourhood Development Plan if it is to be successful at the independent examination.

The Basic Conditions

For context, the independent examiner must assess whether a Neighbourhood Development Plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). The basic conditions¹ are:

- **Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Development Plan**

This means that the Neighbourhood Development Plan must be in accordance with national policy objectives, such as the National Planning Policy Framework (NPPF)

- **The making of the Neighbourhood Development Plan contributes to the achievement of sustainable development**

This means that the Neighbourhood Development Plan must demonstrate how it will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as 'mitigation measures'). To demonstrate that a Neighbourhood Development Plan contributes to sustainable development, sufficient and proportionate evidence should be presented on how the plan guides development to sustainable solutions. This can be set out within the Neighbourhood Development Plan itself, or in the Basic Conditions Statement that will also be submitted alongside the Neighbourhood Development Plan.

- **The making of the Neighbourhood Development Plan is in general conformity with the strategic policies contained in the development plan for the area**

This means that the Neighbourhood Development Plan must not create a conflict with the strategic aims and policies of the development plan (see '2' below).

- **The making of the Neighbourhood Development Plan does not breach, and is otherwise compatible with, European Union (EU) obligations**
- **Prescribed conditions are met in relation to the Neighbourhood Development Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Development Plan.**

Regulations 32 and 33 of the Neighbourhood Development Planning (General) Regulations 2012 (as amended) set out two additional basic conditions to those set out in primary legislation and referred to in the paragraph above. Only one is applicable to Neighbourhood Development Plans and was brought into effect on 28 December 2018. It states that:

- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

The examiner is also required to check² whether the Neighbourhood Development Plan:

- Has been prepared and submitted for examination by a qualifying body.
- Has been prepared for an area that has been properly designated for such plan preparation.
- Meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii) not relate to more than one neighbourhood area.
- Its policies relate to the development and use of land for a designated neighbourhood area.

The examiner must also consider whether the draft neighbourhood development plan is compatible with human rights³.

The comments that follow identify areas that should be addressed when considering appropriate changes to be made to the draft plan following the consultation period. These comments also take into consideration the views of specialist officers in the Council. We would welcome the opportunity to discuss the contents of this letter when you are able to do so.

1. Strategic Environmental Assessment (SEA), Habitats Regulation Assessment (HRA) and other EU obligations

It is a requirement under the Basic Conditions that Neighbourhood Development Plans must be subject to a screening in respect of Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA). The relevant screenings have been carried out and are appended to this response (Appendix 1 SEA and Appendix 2 – HRA).

SEA screening (January 2022)

Wiltshire Council's SEA opinion in January 2022 concluded that the proposals within the NDP were likely to have significant environmental effects - hence requiring a SEA. Such a determination was made for the following reasons:

- I. It is considered that significant environmental effects are likely on the natural, built and historic environment from the allocation of sites for housing, and from other types of development. Salisbury lies within the River Avon Special Area of Conservation (SAC) catchment and must therefore demonstrate phosphorus neutrality. Salisbury is also within the zones of recreational influence for the New Forest protected sites (Special Protection Area, SPA / SAC and Ramsar site). Growth in/around Salisbury could notably impact upon many varied heritage assets, including Salisbury Cathedral and its setting, Old Sarum scheduled monument and its setting and the city's conservation areas and settings. Outward development could also compromise the separate identities of surrounding historic settlements.
- II. The NDP, when screened in respect of the Habitats Regulations, has been identified as requiring appropriate assessment (AA) as a result of the potential for a likely significant effect on the River Avon SAC, and potentially on the New Forest protected sites (SPA / SAC and Ramsar site). Such assessment has implications for the SEA.

HRA screening (February 2022)

Wiltshire Council's HRA screening opinion concluded that the NDP has the potential to lead to likely significant effects on two international sites alone and / or in-combination with other plans and projects. This is due to proposed allocated sites and policies, owing to the potential for increased phosphorus pollution, recreational pressure and air quality impacts on the River Avon SAC and recreational impacts on the New Forest SPA / SAC.

It has therefore been necessary for the policies in the NDP to be taken forward to appropriate assessment (AA) under Regulation 105 of the Habitats Regulations. The AA is conducted by the competent authority, namely Wiltshire Council.

³ The combined effect of the Town and Country Planning Act Schedule 4B para 8(6) and para 10 (3)(b) and the Human Rights Act 1998

Appropriate Assessment (August 2022)

Whilst the AA has concluded beyond reasonable scientific doubt that the NDP will have no adverse effects on the integrity of the New Forest SPA/SAC, either alone or in-combination with other plans and projects, it *cannot however conclude* beyond reasonable scientific doubt that, as a result of Policy 30 (Quidhampton Quarry) the NDP will not have adverse effects on the integrity of the River Avon SAC, either alone or in-combination with other plans and projects. This opinion has been confirmed by Natural England.

Where strategic mitigation coordinated by Wiltshire Council cannot be relied upon, it will be necessary for suitable strategies to be proposed to ensure that any application that comes forward for residential development in respect of allocations or policies in the NDP does not result in significant adverse effects. Any such mitigation measures need to be discussed and agreed with Wiltshire Council.

Regulation 5 of the SEA Regulations requires an environmental assessment of plans which '*in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive (92/43/EEC).*

2. Policy Context

The policy context for the NDP is as follows:

Development Plan

Wiltshire Core Strategy (WCS, 2015), incorporating policies 'saved' from the Salisbury District Local Plan (SDLP), as shown in appendix D of the WCS
Wiltshire Housing Site Allocations Plan (WHSAP, 2020)
Swindon and Wiltshire Minerals Core Strategy (2009)
Swindon and Wiltshire Minerals Development Control Policies (2009)
Swindon and Wiltshire Waste Core Strategy (2009)
Swindon and Wiltshire Waste Development Control Policies (2009)
Swindon and Wiltshire Minerals Site Allocations (2013)
Swindon and Wiltshire Waste Site Allocations (2013)

Emerging Plans

Wiltshire Local Plan Review (Regulation 18)

Other relevant policy

National Planning Policy Framework (NPPF, 2021)
Planning Practice Guidance (PPG)

The draft NDP plans to cover the period 2020 - 2036 and is being prepared alongside the review of the Wiltshire Core Strategy (known as the Wiltshire Local Plan Review, LPR), which plans until 2036 at least. It therefore takes into consideration not only the adopted Wiltshire Core Strategy (WCS) but also work undertaken thus far on the emerging LPR, which is at draft Regulation 18 stage. It is worth noting that, in response to updates to the evidence base on housing and employment needs, the Local Plan period may be updated prior to adoption.

Neighbourhood Development Plans must be in general conformity with the strategic policies of the Development Plan (see above).

3. The Salisbury Draft Neighbourhood Development Plan

The draft NDP represents a considerable amount of work, involving many interests in the local community, and encompasses several issues, pulling them together in a coherent way. The plan has been prepared positively with a proactive attitude to achieving the desired outcomes for the city.

The Neighbourhood Development Plan includes policies that will give added protection and enhancement to environmental and cultural features within the city, in addition to the policies already contained within local and national planning policy.

Overall, it is considered that the Neighbourhood Development Plan is clearly laid out and well written and is a credit to the efforts of the Neighbourhood Development Plan steering group to date. The purpose of this consultation is to identify areas that would benefit from improvement, in the interests of clarity, to inform the preparation of the Regulation 16 submission draft plan. With this borne in mind, the table below sets out Wiltshire Council's response to the draft plan. The views of specialist officers of the Council have been incorporated herewith.

NDP Reg14 reference	WC Reg 14 consideration
General	It is evident that thorough community engagement has been undertaken in the lead up to this regulation 14 consultation on the NDP. It is therefore considered that the steering group have provided sufficient opportunity for the local community to give their views on what the Neighbourhood Development Plan for Salisbury should contain.
Neighbourhood Development Orders	If NDOs are to be submitted be aware of the process for these.
Policies	<p>If the Qualifying Body feels that repetition of strategic policy is necessary, the plan should simply and succinctly reference these instead of repeating them.</p> <p>The Salisbury Central Area Framework (CAF) made a series of recommendations for policy the NDP could do more to promote measures aimed at positive change within the central area i.e. there appear to be opportunities for the NDP that have not been leveraged.</p> <p>The CAF is divided thematically:</p> <ul style="list-style-type: none"> - Vibrancy - Open Space & The Environment - Maximising Salisbury's Qualities - People-friendly Streets <p>The following appear to be evidence-based land-use initiatives for Salisbury city centre that could be transformed into policy at a local, as opposed to strategic, level:</p> <p><u>Vibrancy</u></p> <ol style="list-style-type: none"> I. City Centre Resilience: this is about considering how planning policy can help to promote a flexible approach to enabling suitable alternatives uses to be supported to ensure that vacant premises do not remain empty II. Vacant / Under-utilised Space: this focuses on engaging with owners and landlords to identify, encourage and support the realisation of commercial and residential units (particularly for young people) within vacant / under-utilised upper floors of city centre premises

	<p>III. Evening Economy: develop a vision and strategy to protect and improve the vitality and viability of the city's evening economy</p> <p><u>Maximising Salisbury's Qualities</u></p> <p>I. Update the city's Public Realm Strategy</p> <p>It is noted that the NDP is progressing one of the CAF's recommendations, on updating the city's <i>Shopfront Design Guide</i>.</p>
Flood risk	<p>It is timely, at Regulation 14 of a NDP, to remind the Qualifying Body that the evidence base for the NDP should include the SFRA Level1 Study⁴</p> <p>SFRA Level 1 needs to be employed to inform development proposals. A sequential approach will direct development to areas with the lowest risk of flooding and the NDP process should look to see if there are reasonably available sites appropriate for the proposed development. This might also take account of the type of flood risks that operate and the sensitivity of uses under consideration.</p> <p>Where proposals involve the regeneration of a previously developed site in Flood Zones 2 or 3, and proposed uses for that site cannot be relocated, wider sustainable development objectives (NPPF #163) can outweigh the aim of a sequential approach (NPPF #162). The efficacy of such a course nevertheless needs to be proven through the exception test (NPPF #164). The NDP evidence base should demonstrate how, for each site, this test has been met.</p>
Climate change	<p>Prominence given to climate change in the neighbourhood plan welcomed. The wider range of objectives has the potential to interlink with and support delivery of the climate and sustainability objectives. This is clearly a top priority for Salisbury residents, and for SCC, as shown by the survey statistics on page 20, and the note of the city council's climate emergency declaration on page 26 respectively.</p>
Noise	<p>Planning for noise control is an important part of any neighbourhood plan as the unintended consequences of development proposals often involve amenity impacts such as noise - and also odour, vibration, smoke and fumes. Support for development that is sympathetic to prevailing noise climates and receptors.</p>
Archaeology	<p>Archaeology is notable by its absence from the document, there being only a single mention in the whole text (in Appendix 1). As the chapter on the historic built environment notes, Salisbury has an exceptional historic built environment through both the internationally important Cathedral and The Close, but also within the historic city, which largely retains its medieval chequer board street plan. The survival of the medieval street plan and a high number of medieval and early post-medieval buildings, along with limited large scale development and an absence of widespread cellaring, has ensured that the historic City retains a high archaeological potential and it is archaeologically the most important medieval settlement in Wiltshire. The City has a long history of archaeological investigations that have revealed its medieval past, thereby enhancing the overall significance of the City's historic environment. The significance of the City's archaeological heritage should be incorporated into the document and it is noted that any development with below ground impacts of any substance within the historic City is likely to be subject to some form of archaeological investigation, while this may apply to even very minor works within the Cathedral Close.</p>

	<p>The document rightly focuses on the need to protect views of the internationally important Salisbury Cathedral. There is also a need to protect the setting of and views to the nationally important Scheduled Monument of Old Sarum. The two monuments are inextricably bound, epitomising the old and new settlements of Salisbury. There are dominant views over the new City from Old Sarum, while important views of Old Sarum can be glimpsed from around the city. Where appropriate, major developments should consider and be sympathetic to potential impacts on the setting of this monument which is so important to Salisbury's history and heritage.</p>
<p>Community-led Housing</p>	<p>The acknowledgment of aspirations for the delivery of new affordable housing is noted and site identification looks like a good way forward to help meet the needs of the city, our team would be able to help to meet the housing need and work up a viable scheme in partnership with the local community to explore options.</p> <p>Wiltshire Council's Housing department is currently in the process of developing a strategy to deliver 1000 new affordable council houses across Wiltshire. If you would like to discuss proposals for any sites in the future, we would be keen to see how we could potentially work with you to deliver a range of affordable housing (including shared ownership/part buy part rent) to meet the growing local housing need and meet climate change priorities through innovative solutions for more energy efficient homes, our team also works with communities to deliver housing through Community Led Housing.</p> <p>Community Led Housing is a way in which Affordable Housing can be developed and secured for local people in perpetuity, together with other defined community benefits. This can be led by a group, such as a community land trust or with developer-community partnerships, where a developer may initiate a project, but they carry out meaningful community engagement and seek to provide permanent public benefits that the community would like to see or need from the development. If your Neighbourhood Plan group would like to discuss Community Led Housing in more detail, please contact communityledhousing@wiltshire.gov.uk.</p>

9: Appendices for Part 2	These appear to be evidence documents, but not the only evidence documents. They should be detached from the actual plan and presented separately.
<p><i>Wiltshire Council as Landowner</i></p>	
General	(Landowner response to call for sites) – Objection – There is a presumption that, as sites are put forward, they will be available, but in the case of WC it was only in capacity as landowner for long term view and <i>not</i> as corporate body. The document needs to reflect this.
Figure 21	(GBI Plan / Pembroke School) – Objection – The plan shows a Greenway running through the school site. Whilst we understand this to be indicative it could have an impact on the school's ability to expand in the future.
Policy 12	(Open Space Provision) – If the policy is retained it assumes that the open space will be owned by the City Council, but this may not be the case, and enhancement of an existing open space may also be in ownership other than the City Council, with the commuted sum being provided to the landowner (if retained) or the future owner as defined in the s106.
Pol 13/Fig 23	(LGS designation) – Objection – There has been no landowner engagement over the allocation as LGS, plus there is no indication to the landowner to determine if it may affect them. WC, in its capacity as landowner, therefore objects to this as a matter of principle. Much of the green space owned by the Council could be used for estate regeneration purposes and is held for statutory housing purposes. The lack of landowner engagement means there should not be a default acceptance as LGS, as other opportunities may be missed that generate gains for the local areas.
Para 385	(Coldharbour Lane allocation) – Remove specific reference to “2 to 3” developments as land dependant, and not formally approved / deliverable
Para 401	<p>(Brown St Car Park allocation) – Objection / Amendment – The WC submission in Call of Sites should state the caveat applied in our submission: <i>You will note that the majority of these are current city centre car parks. We are at a very early stage in the consideration of the future use of Council assets in the city and this is clearly linked with the wider master planning and city regeneration strategies which is, of course, to the model of parking provision within Salisbury; use of Park and Ride etc. These applications do not seek to pre-judge those processes but put a marker in the sand in terms of the potential for these sites being available for alternative uses over the course of the plan period.</i></p> <p>The statement should therefore read:</p> <p>“The site was proposed by Wiltshire Council, in its capacity as landowner only, in the 2020 Call for Sites, subject to wider master planning and city regeneration strategies including parking provision within the city centre.”</p>
Policy 32	(Brown St Car Park allocation) – Objection – unless amendments are made to availability and conditions of its release, together with availability for and viability of development.
App 6/S13	(Pembroke School development suitability) – Objection – Allocation may have implications on ability to develop further as education facility.
App 6/S10	(Salt Lane Car Park development suitability) – Objection / Amendment – Site discounted in preference to Site 11, albeit with same ability to deliver and could be included, subject to conditions regarding availability.

NDP response

Comment on **Central Area Framework**: The updated shopfront design guide provides a positive way forward for Class MA conversions in the city centre, and therefore promotes vibrancy. Liaison with owners of buildings is not material to planning but would be better undertaken by WC's economic development team. It is true that the evening economy was not directly addressed but this is something that the NDP would have difficulty influencing (other than through design) because it is up to local businesses to determine what they will provide. The Design Guide goes some way towards providing support for improvements to the public realm. The Steering Group considered producing design guidance for the street scene but it was beyond the available resources, though the steering group did manage to secure a £15,000 grant for new recycling bins which will make a positive contribution.

Comment on Flooding (SRFA):

Comment on **Archaeology**: The **Historic Environment Record has been obtained** and added to the evidence. A new clause has been added to Policy 6.

Comment on **new protected view of Old Sarum**: Policy 9 is a long standing policy that originated with Salisbury District Council and relies on this historic footing. There is no available evidence regarding views of Old Sarum (which lies within a Conservation Area and is therefore protected since a view would be part of its setting). The steering group does not have access to any landscape architecture advice and it is therefore not possible to generate evidence for a view policy of Old Sarum. This may however be something that could be addressed in a review of the NDP. However, in the meantime, new policy wording will be added along the lines suggested by WC.

Comment on **community led housing** – The steering group has worked closely with the WC housing team throughout the preparation of the NDP.

Comment on **Appendixes and evidence**: Agreed that the structure of all documents for Reg. 14 should be modified to make clearer what are appendixes and what are supporting documents.

Comments on **general comments as landowner**: Change text in para 401 to reflect that site was proposed as landowner.

Comments on Figure 21:

Comment on **Policy 12** – Amend Policy 12 to acknowledge other landowners.

Comment to **objection in principle regarding Local Green Spaces**: Planning Practice Guidance advises contacting landowners at an early stage about proposals to designate part of their land as local green space so that landowners have an opportunity to make representations in respect to proposal in a draft plan. This was, regrettably not done by the steering group as an oversight. However, the landowner (in this case WC) has now been made aware and is making representations. So, though the NDP should have contacted WC as the landowner before Reg. 14 consultation, the fact that WC are now responding indicates that they have been made aware and that they are making representations. So, though the steering group did not make contact at the

right time, it did make them aware and so have met the spirit of PPG. It is however unhelpful to have an objection in principle on these grounds since no material harm has been caused – the right to respond has been provided and met. In this response, vague statements are made about how the land could be used for alternative purposes. However, the NDP provides specific sites shown on an OS base and the WC response does not consider these nor make comments on its intentions for individual sites. This is therefore, on all appearances, and objection for the sake of objection and not about any specific sites. On this basis, there will be no changes to the NDP.

Comment on **para 385** – this is actually para 386 and this change will be made.

Comment on **para 401** – replacement text added.

Comments on **Policy 32** – will make opening sentence of policy clearer to reflect that the site must first be made available.

Comment on **Ap6/S13** – This site was NOT allocated so not clear what the objection refers to.

Comment on **Ap6/S10** – Appendix 6 is background evidence and describes the process that the steering group undertook. It is not for landowners to correct the thinking of the steering group. Brown Street Car park was chosen as part of a steering group wide deliberation over Salt Lane car park because of its location near the centre and because of Culver Street car park which is almost adjacent.

Respondent name
Wiltshire Council (subsequent letter dated 22 March 2023) (full letter in Part 2 of consultation statement appendix 9) Only relevant sections shown here
Respondent comment

Strategic Environmental Assessment / Habitat Regulations Assessment

In your letter you ask about Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA). Whilst the development proposal for an NDO is not screened under SEA, it must be screened by the LPA to determine whether it needs an EIA as mentioned earlier.

Although it is noted that you are proposing to remove the site allocations from the draft neighbourhood plan and update your SEA, there will need to be a rescreening of both the SEA and HRA as removing the site allocations is a fundamental change. We would advise that the amended version of the SNDP is submitted to us prior to the Regulation 15 submission for this to be done to avoid any unnecessary delay later in the neighbourhood planning process if anything does come up.

Flood risk

Since SCC is seeking to bring forward discrete development sites as NDOs, as previously advised such development proposals would need to be duly evaluated for flood risk. Strategic flood risk assessment (SFRA, Level 1) as carried out by WC remains available evidence that SCC can consider as well as the work that your consultants have been undertaking on the sequential test.

Local Green Space

On the matter of the SNDP allocating local green space (LGS) in WC ownership, the landowner has been informed that SCC will be in touch as regards potential designation of WC land in Salisbury. The best contact within WC for this matter is the Head of Estates and Development:

Mike.Dawson@wiltshire.gov.uk

Archaeology

Regarding information for the full Historic Environment Record for Salisbury Parish, the online Wiltshire Historic Environment Record search portal can be accessed here: [Historic Environment Records | Wiltshire Council](#).

If you have specific queries about a particular historic record, you can direct these to archaeology@wiltshire.gov.uk.

Central Area Framework

The position you are proposing to take with regard to the Central Area Framework is noted.

NDP comment

Comment on SEA – final version of NDP will be sent to LPA for new screening. AECOM will be asked to update as necessary.

Comment on flood risk – the response is ambiguous. It refers to the NDOs but not the NDP which now contains no sites and therefore it is not clear whether SFRA Level 1 is required for the NDP. (A separate Flood Risk Assessment for Coldharbour Lane NDO is being undertaken at the time of writing). The response says that SFRA Level 1 was carried out by WC and remains available but it is unclear whether it is now acceptable for the NDP to omit a SFRA. However, on the balance of evidence, the NDP steering group considers that since the NDP is not allocating land in an area subject to flooding that the SFRA Level 1 prepared by WC is sufficient. No changes.

Comment on Local Green Spaces – See commentary in Part 2 about LGS. WC has been made aware and asked for comments on the LGS designation but no site specific comments have been received. No changes.

Archaeology – the HER will be consulted and new evidence included in the rewritten NDP including a policy reference in Policy 6 and a new appendix.

Respondent name


Historic England

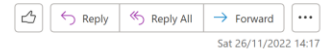
Respondent comment

Salisbury Neighbourhood Development Plan (Regulation 14) Public Consultation



Stuart, David <David.Stuart@HistoricEngland.org.uk>
To: Planning
Cc: andrea@pellegram.co.uk

 You replied to this message on 28/11/2022 09:28.



Sat 26/11/2022 14:17

FAO Annie Child

Due to an oversight Historic England didn't submit any comments on the Regulation 14 consultation received on the Pre-Submission draft of the Salisbury Neighbourhood Development Plan. Our profuse apologies for this.

But we have been made aware by Andrea Pellegram that despite the formal consultation period having ended comments from us would still be welcome. This would be helpful to the Examiner and help ensure that there are no loose ends as far as responses from statutory agencies are concerned.

Mindful though of this timing and the advanced stage that your Plan has now reached it seems most appropriate to summarise our comments in bullet form. I should add that this does not imply that our comments are in any way a compromise or unduly diminished as far as what we would wish to say is concerned. With so many Neighbourhood Plans to respond to it is usually only when a Plan generates cause for concern that we feel the need and can justify the resources involved in submitting more detailed responses!

So in consequence:

1. Our congratulations to your community on its Plan. Much time, consideration and resources have obviously been expended in identifying and understanding those local issues which would most benefit from inclusion in the Plan. There is an impressive scope and depth to the policies which have been promoted, supported by detailed evidence and discrete documents such as the Churchfields Masterplan and Salisbury Design Guide. The latter documents in particular add useful value to existing strategic aspirations for the city.
2. The Plan is also distinguished by its strong emphasis on the city's distinctive and unique historic character, and its protection and enhancement through sustainable policies across a broad and integrated range of socio-economic and environmental themes. We particularly applaud those specific built environment policies structured around key elements of significance such as The Close, The Chequers, and views of The Cathedral, and the general avoidance of generic policies which might add little value to guidance already available in national and local policy documents and Plans.
3. We are happy in principle with the site allocations proposed and have no objection to the broad nature of the development proposed for each of them. Given the sensitivity of the historic context within which they exist care will need to be taken in working up any development proposals, and the design guidance prepared – in the form of policies within the Plan and the Salisbury Design Guide – will help provide a robust framework to help ensure their eventual acceptability.

Once again, our congratulations to your community, and we wish it well in the making of its Plan.

Kind regards



Historic Places Adviser

I now work only 2 days a week, usually Tuesdays and Wednesdays

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NDP response

Noted with thanks.

Respondent name

Laverstock and Ford Parish Council from commonplace website.

Respondent comment

Laverstock and Ford Parish Council is pleased to support the Salisbury Draft Neighbourhood Plan, and wish to complement Salisbury City Council on a well conceived and well written document. The Vision Statement gives a clear insight into the aspirations driving the plan in each topic area.

We are particularly pleased to support their aspirations regarding green/blue infrastructure and transport issues (especially walking/cycling), which are of particular importance to our own residents living on the outskirts of the city.

We welcome the policies aimed at developing brownfield sites, which sit well with our own aims to reduce pressure on development of greenfield sites. Collaboration on sites for displaced businesses would be welcomed, as employment land is commonly included as a feature of large developments, but, all too often, not sufficiently developed or marketed to be viable.

It is good to see higher expectations within the Design Guide than has perhaps been the case over the past few decades, particularly relating to appropriate styles for buildings to blend with the local context, and ambitious sustainable/energy efficient design and construction. We are pleased to see that the Community Survey showed strong support for action on climate change and hopefully this will add to the pressure for a significant uplift in Building Regulation Standards, which developers are then compelled to meet.

Overall there is a lot of detail which can be expected to underpin planning in the city for several years ahead.

NDP response

- Noted with thanks.

Respondent name

The Coal Authority

Respondent comment

No comments

NDP response

None

Respondent name

Salisbury Civic Society

Respondent comment

Will not be submitting a corporate response – asking individual members to respond.

NDP response

None

Respondent name

JP a resident

Respondent comment

1. Fisherton Street is the approach into the city from the station. What a woeful sight for visitors at the moment. The buildings need smartening up and painting, and the pavements look old and tired.
2. The Cathedral and Stone Henge have just been mentioned in the national press as two of the top tourist attractions in the country. What Salisbury needs is a smart, modern and comfortable hotel (not a dreary chain) to attract visitors to stay here, and not press on to another town or city.
3. The hotel needs to have an excellent restaurant for the guests - and open to all. There are not nearly enough really good restaurants in Salisbury.
4. An comfortable, easy-to-negotiate cinema on one level is paramount. Many older audience members cannot climb the stairs to the present cinema, which is a great sadness to the many film fans who live here.
5. Finally, Parking. That old chestnut. If there aren't enough areas given over for parking, no one will come here and shop. Please don't get rid of it. Park and Ride is a real hassle if you are carrying shopping bags, baskets, umbrellas and other paraphernalia. Another point, not everyone wants, or can pay with, a phone.

NDP response

Most matters such as design, the Close, and visitor accommodation have been addressed. Other matters such as parking and a cinema are beyond the scope of the NDP.

Respondent name

SF a resident

Respondent comment

There's a climate emergency. Make people more conscious of it. Mandate turning off commercial (shop, factory) lighting when unoccupied, and reduce the intensity of external lighting during hours of darkness.

We need a proper transport interchange in Salisbury's central car park (Maltings), with a big 'bus station, like at Bath. If it's not done at The maltings, it could be done at Waitrose's site, but that's further from the attractions, and for the future.

Either run a tram/shuttle to the station platform 6, or set aside space to move the railway station (easy in this case) to The Maltings for a comprehensive interchange. One or other is essential.

Add a 3 story car park for shoppers & tourists, subsidised (free?) by business taxes on account of the facility. Price makes a difference - Southampton Road shops are used less when city parking is affordable/free, by me at least.

Whatever might be thought about the desirability of motor cars, plentiful and cheap parking is THE key to keeping visitors and shoppers coming. This is a tourist spot and an overgrown market town after all.

Move the bus, coach, taxi depots here, shopmobility, tourist information etc, 24 hour free toilets & medical health centre. Cycle stands etc. Electric vehicle charging points. You know the list.

There are jammed narrow streets, crazy bus service since closing the previous 'bus station, coach drop-off inconvenience, closing shops (don't need any more). This is a rare opportunity to fix most of this.

Access from the ring road keeps traffic out of the medieval streets which are easy to access on foot.

The existing shops & market are the natural shopping area, there's no need to move the centre, and no need for more shops either large or small.

Developing a transport interchange at the existing railway station is not a solution, and could not have all the necessary services. The Maltings development cannot be viewed in isolation, it has effects on the transport arrangements throughout the City and the region.

Short & medium term money concerns are no way to decide this, which affects a major historic city for all future time. There are deeper heritage issues.

By all means include youth hostel and hotel accommodation along with residential flats above shops, but keep Sainsbury's as is.

Do not move the Library. It's position serves its function. It's function serves its position. It is a free public service, in public ownership. Do not change this. Commercial considerations have no bearing in these matters. The library will die if moved with reduced footfall, do you want that? The art galleries need to be in the same building of course.

Nationally, container traffic could be largely transferred to rail if there were a transfer depot near each town, so only the last mile is by road. This could be at the disused rail yard behind Salisbury station, likewise at Wilton and Solstice Park Amesbury.

NDP response

Most of these matters are not material to planning and so cannot be included in the NDP.

Respondent name

Wessex Area Team, Natural England.

Respondent comment

Habitat Regulations Assessment

We concur with the conclusion of the Habitat Regulations Assessment, namely that:

the Salisbury NDP has the potential to lead to likely significant effects on two European sites alone and/or in-combination with other plans and projects. This is due to the three allocated sites in policies 29, 30 and 31, and 12 other policies due to the potential for increased phosphorus pollution, recreational pressure and air quality impacts on the River Avon SAC and recreational impacts on the New Forest SPA/SAC.

Strategic Environmental Assessment.

We note that the site selection process does not seem to fully consider negative impacts on the GI network. E.g. Site 7: Land East of Devizes Road (Cowslip Farm) does not consider that developing this site will place the currently rural public right of way adjoining it into an urban setting, which is typically of less appeal than a rural one.

We note that some conclusions do not appear to be well supported by the text. For example, the central car park scores poorly for climate change for no clear reason.

It is not clear how the SEA was used to inform the ultimate choice of sites.

NDP response

The sub-consultant AECOM who prepared the SEA will be provided with these comments and asked to update the SEA.

Respondent name

Environment Agency

Respondent comment

We would like to commend the Steering Group and Salisbury City Council for producing an excellent document in terms of sustainability, climate change response and environmental matters. We have only one concern and one suggestion to offer below.

NDP response

This will be addressed in the appropriate part of the NDP (below)

Respondent name

Wessex Water

Respondent comment

Thank you for consulting Wessex Water on the Salisbury Neighbourhood Plan. We note the opportunity to respond via Commonplace however as we wished to include information via attachments it wasn't appropriate in this instance.

NDP response

The specific comments are addressed below.

Respondent name

Dunsford Parish Council

Respondent comment

I am xxxx, a member of Durnford Parish Council who was unable to attend the recent meeting you called with your neighbouring parish councils.

But my colleagues have briefed me and I have read the summary booklet.

On one hand I appreciate the significance of a Neighbourhood Plan but at the same time I am far from convinced that it saves us from developers. On balance it s something that we as Parish Council have now agreed to pursue and will be pursuing the funding available from Wiltshire Council - mainly, some might say for us to try to protect ourselves from Wiltshire Council.

You may or may not be aware of a few of recent planning applications we have fought. The first was for the re-placement of the main salt store buildings at High Post; the original one suffered from design defects and failed but as ever in these matters those who came up with and approved the initial base and structure were blameless. We opposed the new high and pointed out that the Council itself was unable to meet the original specifications set for screening this eyesore from the road. If they cannot enforce the conditions they set for their own development, then what chance of any other ones. We objected : we lost.

The next was for the relocation of the 2 Naish factories from Wilton to land adjacent to the Salt Store at High Post. This failed to satisfy any Core Policies and all hinged on CP34 and the economic necessity and at Strategic Planning it was effectively said that High Post is ugly and to make it more ugly is fine and that since 120 jobs depend on it, then go ahead and develop on open farmland. We fought ; we lost.

Then earlier this year we had PL/2021/11914 for 40 industrial units at High Post. We fought hard - we got 350 objections. Just ONE formal consultee was in favour (Economic Development) . Seven other Wiltshire Council's own departments OBJECTED and the applicant eventually withdrew. HOWEVER, the applicant is coming back again and this time he has the Police and Crime Commissioner on board with the carrot of land for a 4 acres police facility - i.e - this solves yet another mistake of selling off the old police station by delivering a new one for Salisbury but based at High Post. We will fight and we will cite every Core Policy they fail to meet but Salisbury wants a police station and the Council knows this. Do the good people of Salisbury really want to travel to High Post every time they need the services of the Police ?? It is obvious to many that the developer is using this provision simply as a way to gain what he seeks.

So we sit in a very rural community - the joint Parishes of Durnford and Woodford and we are looking down the barrel of the 2 proposals in the Emerging Local Plan - one for 146 acres of development around the Stones Hotel and another for 350 acres of housing to link High Post to Longhedge.

This takes me to the SCC plans and in the vision for 2036 it states : "Salisbury City will retain its separate and unique identity because green spaces between it and other settlements will have been preserved".

NOT SO if the above 2 proposals for High Post to Longhedge get approved. This will see the continuation of the sprawl outward from Salisbury in a ribbon towards Amesbury and if the other proposed housing developments for Amesbury go ahead, then this link up gets a further stage closer. My question to SCC is how can we have such a vision knowing these proposals are in the Emerging Local Plan and not want to raise any concerns ?

The SCC plan also states the "City will thrive" and....will have "sufficient community structure to see its needs". How is a police station 5 miles away meeting the needs of the city ? How can this fit into any concept of having "Sustainable development principles" ?? Any developments at High Post or at other locations outside the City contravene the core policies on Transport and fail to reduce reliance on the use of private vehicles.

I fully appreciate that SCC is like every other parish council in Wiltshire and of course looking out for its own future, but not so long ago it was "Salisbury and District Council" where the interaction and interdependency of the City and the surrounding villages was recognised. The geography has not changed. I fear that Salisbury as a City is not looking more widely ; dumping industry on open farmland is not a great thing to do and if it were ever said that rural parishes should have their share of employment land and sites then we in Durnford already have this with employers like Cheering (300+), Apsley Engineering (20), Stones Hotel, the 30+ business already within the enclosed High Post Business park and the 2 Naish factories to come giving over 600 jobs.

Please do not think that solving Salisbury's problems of not having a police station and wanting to shift employment out of the City to places like High Post is the answer - it is not. I sometimes look at the mess that is Salisbury and accepting what I was told when I first moved here - "everyone knows Salisbury needs a by pass , everyone knows we will never get one". I see a mess. There is no joined up thinking - just some ideas that get put forward forcefully enough for sufficient others to go along with it. The next one that in years to come will be looked back on as a disaster and where were is nobody around to accept any blame will be to have a police station 5 miles away in the open countryside.

If SCC is able to look outside of the City and what ruinous developments will have on its neighbouring and supportive parishes then please join us. Please object to the proposals for the 146 acres at High Post and the 350 acres from High Post to Longhedge. This can be done now on the Sustainable Amesbury website. In the coming weeks we will be hit with the revised proposal from Hibberd Developments for industrial units at High Post PLUS the Police Station - is this where Salisbury really thinks is where its police station should be ? The PCC does.

Please have your Neighbourhood Plan and the various visions and aspirations already set out but please get a grasp of the reality that these visions will have on the neighbouring parishes.

NDP response

The purpose of a neighbourhood plan is not to "save us from developers". In addition, the NDP is restricted to land within its neighbourhood area and thus cannot comment on the planning decisions referred to. Not clear what impact the Salisbury vision will have on Dunsford parish.

Respondent name

RS Salisbury NHS Trust

Respondent comment

I am currently working at Salisbury District Hospital within the Site and Discharge Team. Prior to this, I served for thirteen years in the Royal Air Force, during which time I engaged in various Community First Responder (CFR) schemes and projects. On leaving the RAF, I gained my Adult and Paediatric First Aid, Automated External Defibrillator (AED) and Mental Health First Aid Instructor qualifications, with the plan on delivering adult training sessions.

Following an article, I recently read in the Salisbury Journal regarding the neighbourhood development plan, I came up with an idea which I believe could benefit Salisbury and its surrounding communities.

As the population within Salisbury and surrounding areas increases so does the inherent risk of more medical emergencies and in extreme cases cardiac arrests, which will undoubtedly put more pressure onto our already strained ambulance trusts.

With the introduction of Community AED's which has undoubtedly saved lives all over Wiltshire and to those individuals who had the courage and confidence to give the much needed first aid which makes all the difference in crucial seconds following a cardiac arrest. However, the process of identifying and administering Basic Life Support (BLS) can be a daunting/traumatic prospect and many people may not have the confidence time or money to undertake training courses. On speaking recently to a gentleman at the hospital, he said "I would like to do the best I can to help someone who is sick, but the prospect of delivering CPR or attaching an defibrillator is not something I am familiar with and I wouldn't feel confident in my own abilities".

I firmly believe that a bit of encouragement and hands-on experience could give anyone the confidence to deliver effective and time critical lifesaving interventions.

The Seconds Count community project, consists of delivering short, detailed and at no cost training sessions in BLS and defibrillation, which can be delivered at evenings or weekends across Salisbury/surrounding areas, with the aim of introducing BLS to a wider audience. I would use my background and experience to deliver these sessions in my own time and use training equipment provided by Salisbury Foundation Trust. All I would ask, is that participants of these sessions make a small donation towards the STARS appeal. I would also like to use the opportunity to promote local training providers that deliver first aid courses, which would offer individuals the opportunity to pursue a formal qualification if they wish.

This is something that is very close to my heart and if I can give something back to the community which would increase confidence, personal development, take pressure off our health service and ultimately save lives, I would expect nothing more.

NDP response

This response has been brought to the attention of the City Clerk for her progress because this is not a town planning matter and as such cannot be addressed in the NDP.

Respondent name

Benchmark for Martin Family

Respondent comment

Benchmark

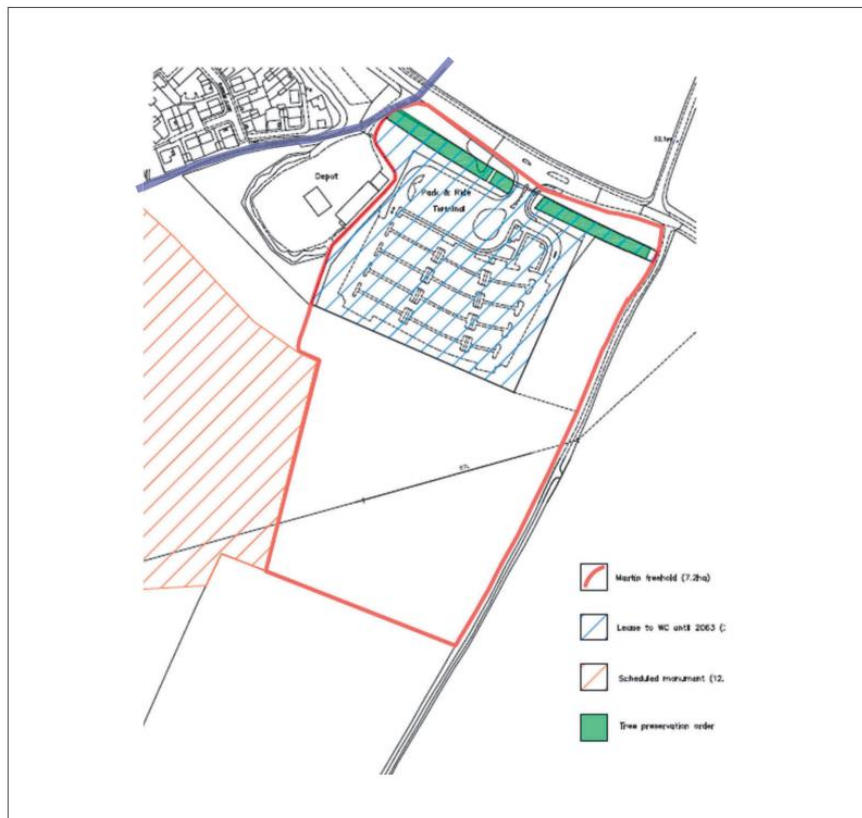
Benchmark Development Planning Ltd
Chartered Town Planners & Development Advisers

Objection to Draft Reg 14 Salisbury Neighbourhood Development Plan (SNDP)

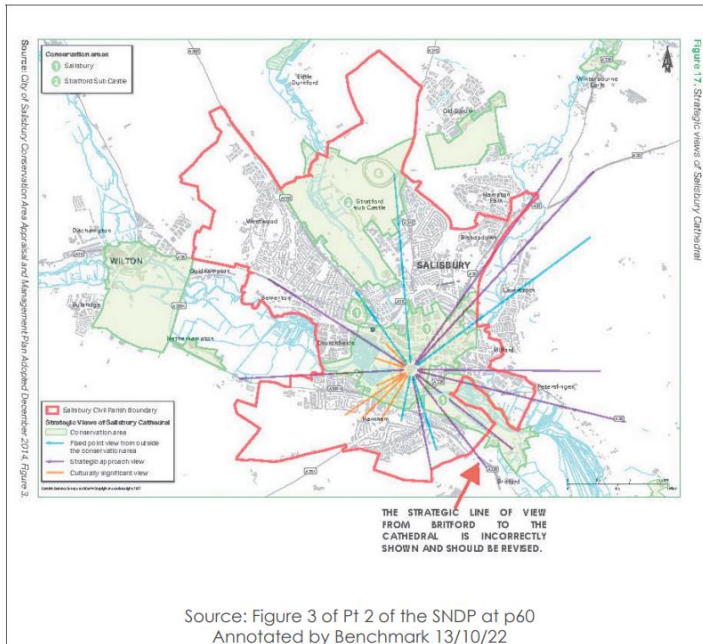
On behalf of the Martin Family (October 2022)

Regarding land at Britford Park & Ride / Hospital

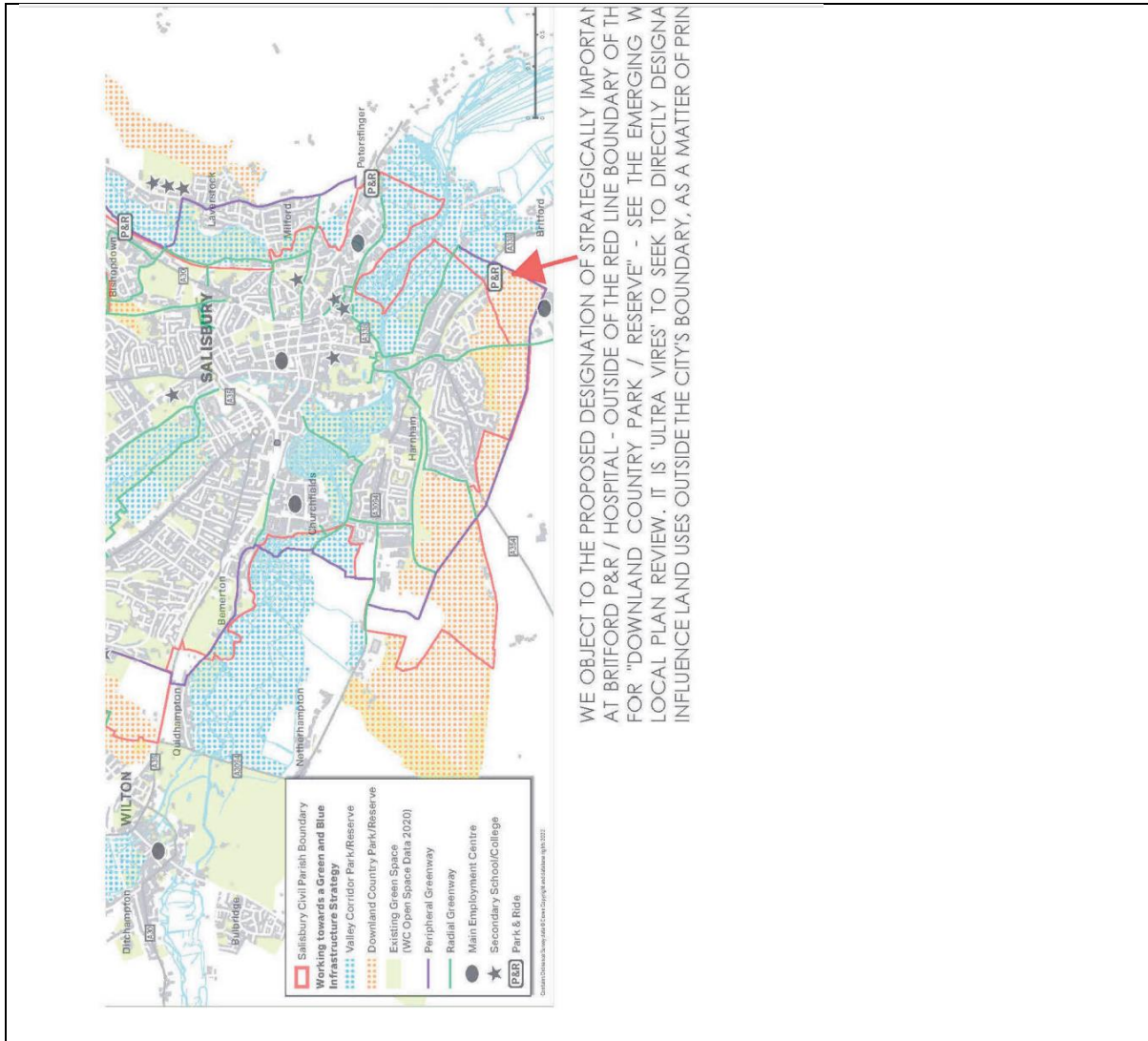
1. We have reviewed the principal draft documents that comprise the Draft SNDP and were surprised that our client's 7.3 ha strategic site has been obliquely included, despite it being located beyond the SNDP boundary. The Plan below shows the land in question (red) and SNDP boundary (blue):



2. We note the draft SNDP includes, in several places, detailed information and proposes policies that would affect land beyond the City boundary. For example, Part 2 Figure 3 identifies visual corridors to the Cathedral. We support the protection of views to The Spire. However, the corridor near the Brixford Park and Ride:
 1. Is not correct and in error includes part of our client's land; and,
 2. The line should become a dotted line once it crosses out of the City limits, to denote that the draft SNDP does not directly seek to deal with the matter (that would for Wiltshire Council to enforce).



3. We also object to the Draft SNDP seeking to include our client's strategic development land within the "Downland Country Park / Reserve" at Figure 21 (p 71 of Pt 2). We have annotated an extract of Figure 21, as follows:



WE OBJECT TO THE PROPOSED DESIGNATION OF STRATEGICALLY IMPORTANT AT BRITFORD P&R / HOSPITAL - OUTSIDE OF THE RED LINE BOUNDARY OF THE FOR "DOWNLAND COUNTRY PARK / RESERVE" - SEE THE EMERGING W LOCAL PLAN REVIEW. IT IS 'ULTRA VIRE' TO SEEK TO DIRECTLY DESIGNATE INFLUENCE LAND USES OUTSIDE THE CITY'S BOUNDARY, AS A MATTER OF PRIN

4. We therefore also object to the supporting Policy 10: Enhancing blue and green infrastructure and biodiversity (p74 of P12). Particularly the third paragraph of Policy 10. We have annotated that paragraph below:

Policy 10:

Enhancing blue and green infrastructure and biodiversity

All new development will provide a minimum of 10% net biodiversity gain as part of the scheme design.

Where this is not included on site, a commuted sum will be required when development is started to be paid to Salisbury City Council for the purposes of biodiversity improvement within Salisbury City, as set out in Appendix 1 and Policy 11.

There will be a presumption against development that encroaches upon or harms any Salisbury blue or green infrastructure asset. Where harm is unavoidable and the harm is outweighed by the need for the development, the harm must be mitigated in full at an appropriate habitat improvement scheme with at least a net 10% improvement. This can be achieved either through a commuted sum equivalent to the mitigation scheme paid to Salisbury City Council, or alternative provision at an agreed site.

OBJECT: IT NEEDS TO BE CLEAR THAT POLICY 10 ONLY APPLIES TO DEVELOPMENT WITHIN THE CITY BOUNDARY

5. We do note that this problem about offsetting the potential impact of development proposals close to but not within the City is addressed, for example at paragraph 175 (p74). However, the paragraph should be amended so the City Council say they want to "work together" – also - with **landowners**:

OBJECT: LANDOWNERS NEED TO BE INCLUDED IN PARA 175.

175 Much of the benefit of Salisbury's GBI extends past the neighbourhood area boundaries, and it will be up to Wiltshire Council, Salisbury City Council and neighbouring parishes to work together to safeguard and enhance GBI beyond the neighbourhood area.

6. We do note that at paragraph 161 the City Council would work with landowners "to establish a network of dedicated mainly off-road routes." Agreed.
7. However, The City Council seem to be seeking to try to place a restrictive green and blue infrastructure blanket over our client's strategic development site, without any prior consultation with us, or with due regard to the need to accord to Wiltshire Council's Core Strategy and emerging Local Plan Review.
8. For example, para 163 of Pt2 of Draft SDNP (at page 72) asserts – in effect – that our client's land should "preferably" stay in "low intensity agricultural production":

OBJECT - THE COUNTRY PARK SHOULD EXCLUDE STRATEGICALLY IMPORTANT LAND FOR MUCH NEEDED (FOR GREATER SALISBURY) HOUSING AND OTHER DEVELOPMENT - SUCH AS LPR SITE 7 AT BRITFORD P&R/HOSPITAL.

163 These country parks and/or reserves could remain in private or mixed ownership and remain in use, preferably in low intensity agricultural production with the emphasis on management for the benefit of wildlife and biodiversity as well as carbon storage and other ecosystem services. This would include new tree and hedge planting and creation of new wetland habitat. This would be in line with the Government's Environmental Land Management Schemes (ELMS) published by Defra in March 2021⁶¹.

Para 163 continues ...

OBJECT - SEE COMMENTS ELSEWHERE.

These areas would be protected from development and, where appropriate, public access would be improved.

9. Clearly, the Draft SDNP seeks to directly control future development beyond its boundaries and this – direction of travel – appears again at page 201 of Pt 2: Appendix 6: Site Allocation Assessment (Feb 2021).
10. Appendix 6 – now somewhat dated – as it must have been written by the SDNP Steering Group ("SG") before February 2021 – could be interpreted as challenging Wiltshire Council (and this was at odds with Central Government Guidance). It seems to say that the SDNP should take

precedence over the LPR. Here is what it says. NB We are not comfortable with this statement remaining as part of the emerging SDNP:

OBJECT: PARA 16 IS AT ODDS WITH GOVT GUIDANCE. NP'S SHOULD BE IN GENERAL CONFORMITY WITH LOCAL PLANS (NOT THE OTHER WAY AROUND).

16 Whilst the SG considers that the LPR is generally supportive of the SNDP, the matter of the brownfield target, and the expectation that brownfield development in this plan period would reduce the need for greenfield allocations in future LPRs will be disputed. The SG will seek to change the approach so that allocations for brownfield land in the current SNDP will lead to reductions in green field development in this plan period (i.e. that greenfield allocations proposed in the LPR may not be necessary where the SNDP allocates sufficient land for housing). As this matter is likely to take months to resolve, this site allocation report will focus on progressing land for housing and seek to maximise brownfield delivery as evidence in support of this requested LPR policy modification.

Richard Greenwood BA (Hons) BPI MRTPI
Director

NDP response

The NDP did not intend to “obliquely include” the Britford park and ride site which is outside the neighbourhood area. Figures 17 and 21 will be reviewed and corrected/updated where necessary.

Figure 17, view over Britford hospital site (outside NA) will be checked and corrected.

Policy 10 wording will be changed to more accurately reflect that “presumption against” is too strong and should be positively worded.

Add “with landowners” to para. 175.

Agree that para 163 is too restrictive and will amend wording to allow for greater flexibility, for instance for strategic allocations.

Agree that Appendix 6 is now dated and it will become background evidence, no longer an Appendix.

The steering group will absolutely not withdraw from the position that it will seek to provide brownfield sites within the city area for development in preference for greenfield sites. This is a fundamental objective in the NDP and is fully supported by the NPPF 120.

Respondent name

Savills on behalf of Wyatt Homes

Respondent comment

14 October 2022
221005 Salisbury NP rep - Wyatt Homes_DRAFT_clean



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Dear Sir or Madam,

Representation to the Salisbury Neighbourhood Development Plan 2020-2036, Regulation 14 Consultation Draft (July 2022)

This representation is submitted to the Salisbury Neighbourhood Development Plan ('Draft SNDP') Regulation 14 consultation by Savills Planning on behalf of our client Wyatt Homes and Tops Estates Limited, which has land interests at Land east of Coombe Road, Salisbury ('the Site') (shown in figure 1).



Figure 1 – Land at Coombe Road: Illustrative Framework Plan

Context

Wyatt Homes is a regional housebuilder with a reputation for high quality developments. They build new homes across the south and have won many prestigious industry awards. The company is based in Poole and has a strong presence in Dorset, Hampshire and Somerset. They aspire to do more in Wiltshire and particularly Salisbury.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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The Site is located on the southern edge of the historic city of Salisbury and provides the opportunity for Wyatt Homes to not only deliver high quality homes, but also to provide wider community benefits. The Site lies across two parish Council areas with the majority of the Site located within Britford parish and the remainder within the Salisbury City boundary.

In March 2021, on behalf of Wyatt Homes and Tops Estates Limited, Savills submitted representations to the Wiltshire Local Plan Review, promoting the Site for a sustainable new neighbourhood with c.380 homes and public open space. The Site falls into two main proposed land use parcels – residential development to the west and public open space to the east, providing an enhanced setting of Great Woodbury scheduled monument, green space and ecological enhancements. The majority of the Site falls outside of the boundaries of the Salisbury Neighbourhood Plan area, although the eastern portion covering the Monument Park parcel and a small component of the residential is within the SNDP boundary. A copy of these representations, including comments on the Local Plan Review, a Sustainability Appraisal of that document and a Vision document for Land at Coombe Road are enclosed with this submission.

Comments on the Salisbury Neighbourhood Plan (Parts 1 and 2)

Wyatt Homes are seeking to work proactively with Wiltshire Council and the Salisbury Neighbourhood Plan Group. An overview of the proposals for the site was presented to Neighbourhood Plan representatives on 15th September 2022. These comments seek clarification on matters raised in the Regulation 14 consultation document in respect of the Coombe Road site and housing delivery matters. Wyatt Homes would welcome ongoing dialogue.

Housing Number, Allocations and Mix

A housing target of 410 additional homes to the existing supply over the Neighbourhood Plan period has been set by the LPA, informed by the Emerging Spatial Strategy. The Wiltshire Local Plan Review consultation document (January 2021) stated that the Salisbury Neighbourhood Plan should identify sites upon which new homes can be built 'where possible on brownfield sites' (paragraph 13 'Planning for Salisbury') but also that 'planning positively for brownfield sites can work alongside allocations of greenfield land' (paragraph 16 'Planning for Salisbury').

Planning Practice Guidance requires neighbourhood plans to exceed housing requirements where possible (paragraph 103). In the case of the Draft SNDP, windfall housing development is anticipated to deliver 2,250-2,850 new homes over the Plan period. In order to meet the need for 'homes aimed at young people...and a growing elderly population' (paragraph 215), the Draft SNDP allocates four brownfield sites in addition to anticipated windfall development.

The housing target for Salisbury is derived from brownfield targets set out in the Local Plan Review documents which acknowledge 'there may be a need to provide further land on greenfield sites' over and above the brownfield targets (paragraph 31 'Planning for Salisbury') and the Draft SNDP should reflect this. The housing target should reflect need, including residual requirement, rather than the capacity identified brownfield sites could provide in order for the Draft SNDP to be sound. It is important for the Draft SNDP to recognise that windfall sites may not meet the housing needs of the population of Salisbury. The NPPF (2021) states that where an allowance is made for windfall sites as part of anticipated supply, there should be 'compelling evidence' that windfall sites will provide a reliable housing land supply (paragraph 71). The Draft SNDP uses past trends as an approximation of what could be delivered by windfall development and assumes this will all come forward on brownfield land – a finite resource within the City. Planning Practice Guidance requires 'a sustainable choice of sites to accommodate housing' as this 'will provide flexibility if circumstances change and allows plans to remain up to date over a longer timescale' (paragraph 103).

There is no reference within the Neighbourhood Plan consultation documents as to the process for reviewing sites ultimately put forward for allocation.



We would suggest the Draft SNDP firstly clarifies the methodology used in setting out allocations and secondly takes steps to ensure sites beyond the Neighbourhood Plan area boundary are not prejudiced in their delivery if allocated in the Wiltshire Local Plan to ensure a sustainable choice of sites to accommodate housing is planned for.

Wiltshire Council are in the process of preparing a new Local Plan which will set out the strategic policies for the local authority area. The Draft SNDP does not refer to Draft allocations or sites promoted as part of this process, and there is no reference to the Interim Sustainability Appraisal and Site Selection Report which informs the Local Plan Review and included sites within the Salisbury Neighbourhood Plan area boundary. These documents found that Land at Coombe Road (and other greenfield sites) performed well when considered against other sites within the City including allocations in the Draft SNDP, such as Quidhampton Quarry. The Draft SNDP and the allocations it contains implies no future expansion of the City would be considered, which presents a disjointed plan-making process for the Salisbury area and does not provide the clarity needed to encourage sustainable development.

Planning Practice Guidance suggests that when strategic housing policies are being updated, neighbourhood planning bodies may wish to consider review also (paragraph 103). Up-to-date evidence should also be reviewed. We would therefore suggest the Neighbourhood Plan refers to the evidence base and engagement undertaken during the Wiltshire Local Plan preparation process to ensure the Development Plan documents do not conflict and that development adjacent to the Neighbourhood Plan area boundary is not prejudiced by policies within the document.

The Draft SNDP sets out how the housing number set out by the LPA will be met. However, while capacity may be met via windfall sites, it is not clear whether housing need will be met through the policies and allocations. Wiltshire Council have acknowledged the Local Plan Review period timescales need to be reviewed with subsequent implications for housing numbers and targets. It is therefore clear that by planning only for brownfield allocations, the Draft SNDP will not meet housing needs in the city.

If Salisbury is to grow sustainably, the Draft SNDP should plan for a mix of housing to meet need. The 2020 household survey found detached homes to be in greatest demand, with flats of lowest demand (paragraph 230). However, the Draft SNDP only seeks to allocate sites on brownfield land – more likely to deliver flatted development due to the nature of the sites. There is also an historic under-delivery of larger dwellings, as shown by the historic delivery of majority 1- and 2-bedroom dwellings from 2016-2020 (Figure 25). As set out in the Draft SNDP, flats are more likely to be economical and attractive to first time buyers and those seeking to downsize affordably (paragraph 230). However, in order for Salisbury to grow sustainably homes should be provided which meet lifecycle needs, including terraced and detached houses to accommodate family growth. The site allocations in the Draft SNDP should therefore be revisited in this context to ensure a sustainable mix of dwellings in planned for and include sustainable greenfield locations or not prejudice their delivery.

There is no reference within the Draft SNDP to the March 2022 Housing Affordability Ratio (which set out that average house prices in Wilts were 10.32 times average earnings). Policy 15 regarding affordable housing is therefore welcome, but as with market housing, a mix of dwelling types and sizes should be planned for in the Draft SNDP.

The Draft SNDP acknowledges the trend towards an aging population in Salisbury (paragraph 233). If the City is to attract younger people, not only is appropriate housing required, but also good opportunities for employment. Clarity should therefore be provided whether the link between provision of employment land and housing requirements has been considered fully in the Draft SNDP and if so, how.

Allocations put forward in the Draft SNDP (Policies 16 and 30-32 inclusive) are not new sites put forward for development. Policy 16 (Churchfields and the Engine Shed) seeks the 'natural redevelopment' of the area. Whilst this area presents a significant opportunity for the City this is a complicated site and has been historically slow to come forward. There are also competing land uses on the Churchfields site which is an



important commercial location within Salisbury and the need for employment space must be planned for effectively if the aspiration for sustainable growth is to be met.

Quidhampton Quarry was rated 7th out of 8 sites in the Interim Sustainability Appraisal and Site Selection Report for the Wilts LP consultation. The Draft SNDP acknowledges it is not served by adequate road connections, has other delivery problems and has an existing Local Plan allocation for employment. The LPA have also stated that they would object to the allocation of this site within the Draft SNDP.

Coldharbour Lane is allocated on the basis of homes delivered on this site via Wiltshire Council's residential development team. The site is likely to be constrained by significant contamination issues and would be subject to a Neighbourhood Development Order for which timescales are not indicated.

Brown Street car park is sustainably located and was proposed for allocation in the 2020 Wiltshire Council Call for Sites. However, the deliverability of the site must be questioned given its unsuccessful historic promotion, queries over alternative parking provision to replace it and ultimately no development likely to come forward.

All of these sites have significant constraints which should be considered more thoroughly. As set out above, allocating only brownfield sites will not meet the housing needs of Salisbury if it is to grow sustainably. Land at Coombe Road is relatively unconstrained in comparison to the allocations, and the Draft SNDP should therefore consider strategic growth of the city on greenfield sites such as this where they can meet housing need and mix requirements in a sustainable manner with unfettered delivery issues compared to brownfield sites.

Concerns regarding the deliverability of the sites allocated raises questions regarding whether the Draft SNDP is adequately planning for sustainable growth. Recent appeals (ref. 6286853, 3289757 and 3295577) confirm that the Wiltshire Southern Housing Market Area does not have a five year housing land supply (a land supply of only 4.88 years). It is therefore critical that the Draft SNDP allocates sites which can exceed the capacity set out by the LPA to meet this historic shortfall and deliver much-needed housing, and plan in a sustainable, strategic manner.

Plan period

The Plan period for the Draft SNDP reflects that of the Wiltshire Local Plan Review. Wiltshire Council have acknowledged they need to extend the Plan period in order to meet the tests of soundness as set out in the NPPF and the SNDP therefore needs to align. This has implications for the housing requirement for Salisbury – the revised Plan period to 2038 includes an additional 5,000 homes of the in total over Wiltshire. Given the important role Salisbury plays as a principal settlement in Wiltshire, this revised housing requirement should be considered in the SNDP. The SNDP should recognise the important role of Salisbury in the wider settlement hierarchy and that the Wiltshire Local Plan Review will need to plan for sustainable extensions to Salisbury to meet strategic growth needs.

Green and Blue Infrastructure

As set out in the presentation to the Neighbourhood Plan representatives and our response to consultation on the Wiltshire Local Plan, the proposals for Land at Coombe Road include housing on the western part of the site and provision of a significant area of public open space on the eastern part of the site, including parkland at the site of Great Woodbury – providing a significant enhancement to this historic asset as well as space for leisure and ecological improvements. Aspirations for the eastern part of the Land at Coombe Road therefore align with the objectives of the Neighbourhood Plan in regards to blue and green infrastructure but this can only be delivered as part of a comprehensive development scheme for the wider site.

The Draft SNDP seeks to allocate sites for green and blue infrastructure outside the Neighbourhood Plan area boundary, this is clearly an unreasonable approach and SNDP should be restricted to the area covered



by the designated neighbourhood plan area only. Planning for the future of these areas outside the SNDP area boundary is the responsibility of the Wiltshire Local Plan and other neighbourhood. We see no justification for the Draft SNDP to overlap its boundary. In addition, Planning Practice Guidance states that only one neighbourhood forum can plan for a designated neighbourhood area. Where areas overlap or different NP forums have alternative ideas they should be encouraged to work together as a single neighbourhood forum (paragraph 039) – the Draft SNDP should therefore only cover land within the Salisbury Neighbourhood Plan area in order not to be contradictory.

Furthermore, it is not clear the mechanism by which the proposed 'Downland Country Park / Reserve' would be enacted nor how the sites would be delivered in this context. The status of the 'Downland Country Park/Reserve' annotation on Figure 21 is unclear and should be removed from the plan.

Green or blue infrastructure will most likely come forward as part of a wider development proposition and the draft site allocations should be considered in this context. As many of the proposed green and blue infrastructure areas are located outside the designated SNDP area, draft SNDP policies should therefore be reviewed to ensure deliverability of this important strategy. As well as including land outside the SNDP area, a clear policy justification has not been provided in the Draft SNDP for the need for 'Downland Country Park / Reserve' and the designation should therefore be removed.

Conclusion

These comments are made by Wyatt Homes in response to the Salisbury Neighbourhood Development Plan Draft consultation. They seek amendments to the Plan as presented to ensure its policies are clear and it plans sustainably for the future growth of Salisbury. These can be summarised as follows:

- The Draft SNDP should revisit housing targets to ensure housing need is met rather than targets worked backwards from potential availability;
- The Draft SNDP should recognise the potential for strategic growth of the City within and adjacent to SNDP boundaries; in particular at Land at Coombe Road which can sustainably deliver housing and public open space;
- The Draft SNDP should remove allocations proposed outside the boundaries of the SNDP area as there is no mechanism within the Draft SNDP for these to be delivered.

Wyatt Homes welcome the emphasis on high-quality development and the importance of green space in Salisbury City and trust that the Neighbourhood Plan Group will consider the comments provided as part of this consultation. Wyatt Homes welcome the opportunity to meet with the Neighbourhood Plan Group and look forward to working with the Group and Wiltshire Council to ensure the SNDP is sound and delivers sustainable development in Salisbury.

Yours sincerely

A handwritten signature in black ink, appearing to read "Alison Broderick".

Alison Broderick
Associate Director

Encl Wyatt representations to the Wiltshire Local Plan
Vision document for Land at Coombe Road
Sustainability appraisal of the Wiltshire Local Plan

NDP response

This site was not put forward in the 2020 Call for Sites.

The representation is extensive but acknowledges that the NDP proactively seeks to allocate land for housing and that it exceeds the target (set by Wiltshire Council in the LPR). The projected windfall sites (over 2000 expected) against the requirement (410 homes) leaves a significant margin for failure and it can be assumed that with past trends what they are, it is almost a certainty that the requirement of 410 homes can be met through windfall development.

With regard to the approach to new site allocations in the future, this will be a consideration for the review of the NDP if such occurs.

The NDP is criticised for not taking account of strategic sites. This is incorrect – the NDP made full reference to the LPR and drew on evidence therefrom. In addition, NDPs are excluded from addressing strategic matters such as future housing allocations that may or may not be made in the LPR. The NDP is being criticised for matters that it cannot control.

The NDP has not been formed with the objective of only allocating brownfield sites. A site methodology was employed that considered greenfield sites that were put forward (and this site was not put forward at that time) but the greenfield sites were discounted for planning reasons and not because they were greenfield. The process is fully described in Appendix 6.

The amount of affordable housing is set by WC in the Core Strategy and is not something that the NDP can affect. Policy 15 provides a broad indication of the types of affordable housing but leaves decisions on house mix (number of bedrooms) to applicants to propose. This is a flexible approach that focuses on the type of affordable housing that is required but allows the market to decide what the remaining 60% market housing will be.

It is true that the NDP does not make much reference to employment land, but it relies upon policies in the Core Strategy in this regard, and it seeks a flexible approach to redevelopment of the city in the Shopfront Design Guide and design guidance masterplan for the Churchfields industrial area and also seeks to protect existing Class E businesses in Churchfields. Therefore, this criticism is unjustified because it is beyond the scope of the NDP to allocate land for employment.

It is also true that the 3 site allocations are on difficult sites that face a host of issues. These were the sites that came forward in the call for sites – no “easy” sites were proposed. For Quidhampton Quarry, the steering group has been working with the proposer to identify and agree the best policy conditions. For Coldharbour Land and Brown Street it is acknowledged that the current proposals are not fully worked out, but neighbourhood development orders are in preparation which will address the concerns raised in this response.

The NDP is not allowed to consider strategic matters such as how it should contribute to overall Wiltshire housing need over whatever plan period the planning authority finally opts to use in the

LPR. It is therefore incorrect to criticise the NDP for doing something that it is not empowered to do.

With regard to blue and green infrastructure, when a proposal is put forward on the responder's site, the City Council will certainly wish to engage proactively regarding the natural environment and other planning matters.

Agree that Figure 21 should not refer to land outside the parish boundary. This will be amended.

The rationale behind environmental improvements is set out clearly in Appendix 2.

Respondent name

Savills on behalf of Hallam Land

Respondent comment

30 September 2022
Salisbury NP Representation (Hallam Land) - SUBMISSION

[Submitted by email only](#)



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Dear Sir or Madam,

Representation to the Salisbury Neighbourhood Development Plan 2020-2036, Regulation 14 Consultation Draft (July 2022)

The representation is submitted by Savills Planning, who acts on behalf of Hallam Land Management Limited ('Hallam Land') which has land interests at land off Milford Mill Road, Laverstock ('the Site') (shown in figure 1).

Figure 1 – Land under option to Hallam Land either side of Milford Mill Road



Context

Hallam Land Management Ltd is a wholly owned subsidiary of Henry Boot PLC and has been promoting development land successfully for over 25 years. It is promoting the Site through both the Wiltshire Local Plan review and the Laverstock and Ford Neighbourhood Plan as a suitable and sustainable location for housing.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.
Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.
A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD





The Site comprises three land parcels (10.65ha combined) located either side of Milford Mill Road. The land comprises agricultural land, and it adjoins the built - up settlement edge of Laverstock to the north and Petersfinger to the south, bordered by the rail line. The Site slopes slightly up to the northeast and includes a number of trees and hedgerows within and around its periphery. The southern and western land parcels are bisected by Milford House Care Home. Salisbury city centre is approximately 1 mile west of the Site.

All three land parcels are currently accessed from Milford Mill Road which connects via Petersfinger to the A36. The largest parcel is also accessible from Queen Manor Road to the north. Existing housing areas are located to the north, while the railway line and Southampton Road Retail Park are located to the south.

The promotional information that has been submitted to both Wiltshire Council and Laverstock and Ford Parish Council demonstrates that c.70 houses could be accommodated across the Site and that this would contribute towards a five year housing land supply within the South Wiltshire Housing Market Area, as well as Wiltshire as a whole.

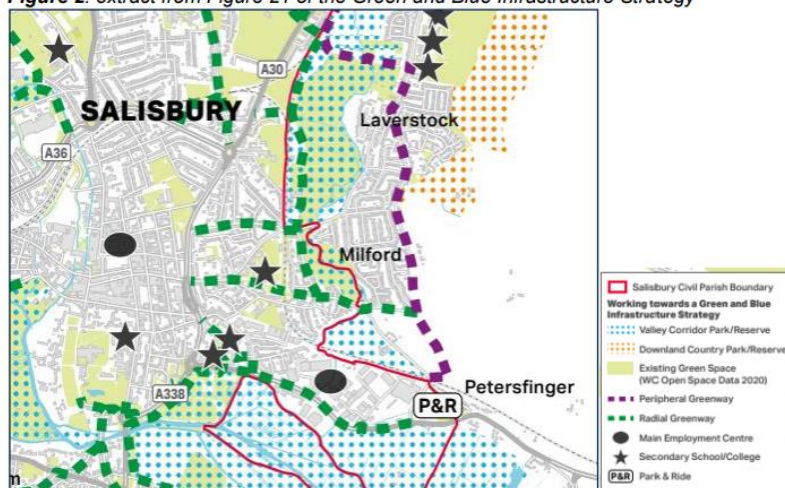
Comments on the Salisbury Neighbourhood Plan

Paragraph 161 of the Salisbury NP Green and Blue Infrastructure strategy states that 'Figure 21 illustrates the potential for safeguarding the important green and blue spaces in the river valley corridors and on the high ground within and around the city by creating a series of country parks and/or reserves.'

Part of the Hallam Land Site to the south of Milford Mill Road has been identified as Valley Corridor Park / Reserve. The Salisbury NP states that the ambition for these designated areas of land are that they would remain in low intensity agricultural production and/or managed for the benefit of wildlife and biodiversity incorporating new tree or hedge planting. These areas would be protected from development and, where appropriate, public access improved.

Hallam Land are proposing that the land north and south of Milford Mill Road could accommodate c.70 dwellings and therefore the proposed Valley Corridor Park / Reserve designation is not appropriate or compatible with Hallam Land's proposed use.

Figure 2: extract from Figure 21 of the Green and Blue Infrastructure Strategy





Hallam Land's concerns with this aspect of the draft Salisbury NP are two-fold: firstly the land in question is located outside of the designated area for the Salisbury NP and secondly the Valley Corridor Park / Reserve is not consistent with Hallam Land's aspirations to deliver a sustainable housing growth location.

Salisbury NP designated area

Land off Milford Mill Road is located within the Laverstock and Ford NP designated area and not the Salisbury NP designated area. The Laverstock and Ford NP does allocate some parcels of land as green space to be retained, however, it does not allocate land in Hallam's control as green space or a valley corridor, rather it does not allocate the land at all. The Laverstock and Ford NP designates green space in line with the proposed Wiltshire Core Strategy proposals, which also does not designate the land in Hallam's control.

Planning for the future of this area is the responsibility of the Wiltshire Local Plan and the Laverstock and Ford NP. We see no justification for the Salisbury NP to overlap with these documents that will eventually form the development plan for this part of Wiltshire.

Furthermore, National Planning Policy Guidance states that:

'A local planning authority can only designate one neighbourhood forum for a neighbourhood area. Where there are competing forum applications for the same or overlapping areas, the local planning authority should encourage a dialogue between the applicants in order that they can consider working together as a single neighbourhood forum. The onus is on the prospective neighbourhood forums to be constructive and to reach an agreed solution.'

On this basis the Salisbury NP should not be contradictory to the Laverstock & Ford NP or the Wiltshire Local Plan.

Justification for a Valley Corridor Park / reserve

Hallam Land feel that there is no justification for the Valley Corridor Park / reserve designation across the whole of the land parcel to the south of Milford Mill Road. The land to the east of the existing care home is suitable for residential use (approximately 20 dwellings), while the remainder of the parcel (to the west of the care home) is proposed for public open space because of its relationship with the edge of Salisbury and its location within a flood zone. Land to the north of Milford Mill Road can accommodate c.50 dwellings. Notwithstanding the extent of the Salisbury NP designated area, designating all of the land to the south of Milford Mill Road as a valley corridor will prejudice the delivery of much needed housing in the Salisbury HMA and act to prevent sustainable development.

Conclusion

Hallam Land objects to the draft Salisbury NP because it is not in its remit to seek to control the use of land outside of the NP designated area. A valley corridor park / reserve across the whole of the parcel to the south of Milford Mill Road is also not justified and would conflict with Hallam Land's aspiration to deliver housing growth in this location, something that is critical to a 5YHLS in Wiltshire and sustainable growth in the Salisbury HMA.



As set out earlier in this representation only one neighbourhood forum can plan for a designated neighbourhood area. Where areas overlap or different NP forums have alternative ideas they should be encouraged to work together as a single neighbourhood forum. The Salisbury NP at present contradicts both the Laverstock & Ford NP and the Wiltshire Local Plan Review where it designates land south of Milford.

Agree that Figure 21 should not refer to land outside the neighbourhood area and this will be addressed in an amendment to that figure.

Respondent name

Harnham Neighbourhood Association

Respondent comment

Preamble

Initial investigation revealed little interest at both the Guildhall and the Salisbury library as near to nil, Response has therefore been restricted to on line examination of the rambling 500 page document, *It needs drastically editing .There is much to commend but we consider there are things to leave out for clarity and some serious omissions . Some policies would be better amalgamated to make the document easier to read.*

The task being to clearly summarise the parameters the City Council has the powers to influence.

The editing process needs to spell out the planning framework hierarchy separately and especially that which restricts real local concerns the plan spells out (for example highway infrastructure) In view of the National Framework Strategy .which states :Neighbourhood plans will enable local people to influence the development of where they live and work. **The strategy must not exclude criticism** and the SNP needs first and foremost to advise any enquiry of necessary amendments from changed and unforeseen circumstances in perpetuity. A remit to revise.

highly detrimental impacts since commencement of the plan

No place can have sustained the level of damage to its people and business as Salisbury . following the Novichok poisonings and two years of pandemic all of which impacted on the city centre. No parish can have suffered like Salisbury. Salisbury is unlike any other Parish not only due its size . **The plan has to ask for Salisbury being a special case.** It does not. Climate change is also a long term problem with us and needs headlining.

The site

The red line boundary of the city conflicts with the map fig.21 which outlines the Park and ride bus routes needs to be the real boundary. Proposed major routes for cycling and Walking serving the huge redevelopment of the hospital (Heat project) need to be included`.

Piecemeal thinking.

Harnham has been the epicentre of Wiltshire Housing Land Allocation plan in South Wiltshire and the target of big developers. The outcome has been the lack of solutions that ignore well founded local concerns and no consideration beyond actual site allocation boundaries. This is not what the National Planning guidelines for neighbourhood plans advise. A clear statement on the need for the plan to promote all relevant elements must be part of site development considerations.

Superfluous comment and lack of consultation

Where policies of a protective nature exist ,such as conservation zones and listed buildings There is no need to do more than briefly mention them. A policy document needs to be concise .

Thereby making it easier for those not use to planning policies to comment(see preamble above) A vehicle for bottom up comment is the document itself. Work remains to achieve this.

Where protective legislation exists ,it should be removed from the plan.

134 states that which is not well designed can be refused however lack of consultation is enabling developers to present flawed cases for permission. Harnham in particular is an area where even power of councillors to demand consultation, has been ignored.

There is no need to comment on the historic building fabric. Listing is already tightly controlled. There is no need to mention the Close. photographs merely useful graphics (historic built environment section)

Design guidance is subject to planning process. A commitment to architectural competition on sites needing sensitive solutions might be as much as the plan should say.

Other factors than tourism

The focus on Tourism ignores that Salisbury traffic issues deters local people, those more likely to support the local economy in winter. The Central Area framework must be an essential appendix. It states 69% of people on the fringe of the city do not use its facilities. Poor public transport cannot help, neither costly parking backed by aggressive control. Historically central Salisbury used the river to generate electricity for business. Supporting sustainable energy projects would be to ensure a life line long term and encourage business to invest in the city. Working from home is a new kid on the block post covid (the plan must take on board a changed environment and plans to deal with it)

The housing plan must **embrace landscape and open space** provision. Policies 12 and 13 reinforce this but it needs to be reiterated for housing.

Specific sites

THE MALTINGS

The current plethora of termini spread over a wide area must be replaced by one central point. The plan should promote resolution to resolve this and the Matings has huge potential to do so. A bus/taxi concourse and rly station waiting facilities. A welcoming facility for tourist and resident alike could include: Information centre facilities, a police post, banking and other businesses. Nearby medical facilities close to a local transport hub make for good planning. An alternative to Brown St. (refer also to business below)

Brown Street

The Central Area Framework does not exclude the site from a neighbourhood plan. This needs to be clearly stated. This seems to conflict with any use of the Maltings site for an integrated community health service where an element of such services exist already. Use of Brown street as a multi storey car park with its upper level as a roof top green community space and a café facility is possible. It would enable greater pedestriansation/

Health facilities need to be in consultation with the HEAT project. Some discussion with the Central Area Framework and between the NHS needs to be widened.

Policies

Health pressures determine the need for a thorough air quality action plan (now out of date) Policy 15. ECO technology must embrace filtration and be in the local plan brief. Pressure on health services can be reduced as a result of air quality management on the micro scale.

Policy 17 has no mention of **Harnham as an infrastructure route to Salisbury Hospital**. A movement plan for a large refurbishment of the hospital and a university faculty has been the subject of negotiation for many years and a draft plan is under consideration. The Neighbourhood plan should support the elements that pass through Harnham and if a pedestrian bridge were provided would help correct a lack of walking/cycling and public transport facilities from a community deprived East Harnham. Cost is relatively small.

Policies 23-25 are supported

Policies 26 -29 WE refer to the above specific sites note
Policy14 why cannot this be edited to go with policies 1-5 biodiversity et al.

HOUSING

Policy 15 **Housing Needs developer guidance to include:**

Prime energy generating schemes in cases where the provision of affordable and social housing is to be provided. Section 106 agreements relating to infrastructure and community provision must be **timed at early phases to prevent land banking.**

Sites must be approved in relation to **infrastructure capacity**. Numbers have tended to override any other consideration South of the river and conflict with in some cases County Council policy . **Historic housing data** is irrelevant . The house type data is however a guide.

It is more a guide as to what percentage of affordable housing is needed. Smaller units indicating **the 40% rule** may need to be higher

Housing policy must demand **a high certification of inspection and testing** to achieve sustainable energy targets . Affordable and social housing need to be low energy .

All sites have their own infrastructure peculiarities, their own terrain. The standard site is a fiction but the illusion exists that the standard detached attracts buyers. **The plan must recognise the need to use difficult sites due** to local land shortage . It is worth looking at what the old District Council did with Old ST. Harnham. . Sites themselves create character often requiring tailored solutions .

Eco housing itself is likely not to look anything like a standard house type . Orientation to south and West has eco implications

A variety of house types needs to be part of the plan . This is an omission. The policy needs to address housing for the disabled which is often very specific and should be a relevant percentage of development.

A new type of **unit geared to those who work at home** and are in effect start up businesses need simple serviced spaces separate from a flat or house unit. Grouping them is possible. Add to policy 26

We must consider allocation of land for self build , shell housing for completion to be components of affordable housing. In order to remain affordable in perpetuity, the council should take a small controlling stake. Cornwall already has the model due to high house costs and second homes.

The plan must encompass all the aforementioned.

The stock of **Reema concrete houses** should be taken off the defective category since they are not morgagable but potentially provide family homes that can be further improved or divided.

They are not structurally defective.

It is worth noting a twin engine aircraft hit one on Bemerton Heath, It is still standing.

This huge stock is currently being bought by the cash in hand renting market reducing the stock of affordable houses to buy. Both Bemerton and Harnham have big stocks of Reema houses.

Cannot **Churchfieds** simply be designated as a site for housing .Design and layout being subject to Policy 15.

NDP response

The response is strongly worded and clearly, there are very deeply felt emotions being expressed. However, it is very imprecise in its criticism and it is therefore difficult to understand how individual policies should be amended.

The response is heavily focused on transport matters that are, unfortunately, outside the remit of neighbourhood planning. Other matters such as building control are also outside of the NDP's remit.

There are a number of criticisms about affordable housing and the need for a housing mix policy but these are addressed in Policy 15. Live work units have been mentioned in the policies on Churchfields and Quidhampton quarry and can also take place under Class MA development which is covered under a design guide.

Respondent name

SF a private resident

Respondent comment

Dear Planners,

There's a climate emergency. Make people more conscious of it. Mandate turning off commercial (shop, factory) lighting when unoccupied, and reduce the intensity of external lighting during hours of darkness.

We need a proper transport interchange in Salisbury's central car park (Maltings), with a big 'bus station, like at Bath. If it's not done at The maltings, it could be done at Waitrose's site, but that's further from the attractions, and for the future.

Either run a tram/shuttle to the station platform 6, or set aside space to move the railway station (easy in this case) to The Maltings for a comprehensive interchange. One or other is essential.

Add a 3 story car park for shoppers & tourists, subsidised (free?) by business taxes on account of the facility. Price makes a difference - Southampton Road shops are used less when city parking is affordable/free, by me at least.

Whatever might be thought about the desirability of motor cars, plentiful and cheap parking is THE key to keeping visitors and shoppers coming. This is a tourist spot and an overgrown market town after all.

Move the bus, coach, taxi depots here, shopmobility, tourist information etc, 24 hour free toilets & medical health centre. Cycle stands etc. Electric vehicle charging points. You know the list.

There are jammed narrow streets, crazy bus service since closing the previous 'bus station, coach drop-off inconvenience, closing shops (don't need any more). This is a rare opportunity to fix most of this.

Access from the ring road keeps traffic out of the medieval streets which are easy to access on foot.

The existing shops & market are the natural shopping area, there's no need to move the centre, and no need for more shops either large or small.

Developing a transport interchange at the existing railway station is not a solution, and could not have all the necessary services. The Maltings development cannot be viewed in isolation, it has effects on the transport arrangements throughout the City and the region.

Short & medium term money concerns are no way to decide this, which affects a major historic city for all future time. There are deeper heritage issues.

By all means include youth hostel and hotel accommodation along with residential flats above shops, but keep Sainsbury's as is.

Do not move the Library. It's position serves its function. It's function serves its position. It is a free public service, in public ownership. Do not change this. Commercial considerations have no bearing in these matters. The library will die if moved with reduced footfall, do you want that? The art galleries need to be in the same building of course.

Nationally, container traffic could be largely transferred to rail if there were a transfer depot near each town, so only the last mile is by road. This could be at the disused rail yard behind Salisbury station, likewise at Wilton and Solstice Park Amesbury.

NDP response

Almost all of these comments relate to transport which is outside the scope of the NDP. The NDP also has no effect on the location of the library.

CHAPTER 1 INTRODUCTION (EXCL. VISION)

Respondent name	
Wiltshire Council	
Respondent comment	
Para 11	The way the NDP is written, they seem to make these documents part of the NDP. They should either be part of the NDP and examined as such, or should be displayed as evidence. There appears to be a mix of evidence and documents such as masterplans that the NDP is trying to get approved.
Para 17	The context of Salisbury doesn't feel quite right. Salisbury isn't really that close to Salisbury plain. It is a similar distance to the New Forest for example. It may be better to say close to the Hampshire / Dorset border, or similar, to give context. When the para talks about a travel interchange, the plan should say where the train services go so that it again gives more local context. The plan could pull more on the landmarks that fall close to the Neighbourhood Plan Area such as the Cathedral and Old Sarum scheduled monument.
Paras 21-24	This isn't vision, it is background and should be in a background document not the Neighbourhood Plan.
NDP response	
<p>Comment on para 11: Agree that there should be better organisation of background document so appendixes (which form part of policy) are clearly differentiated from evidence (which does not form part of policy). This will be addressed at submission stage.</p> <p>Comments on para. 17: text modified to give greater clarity on location and transport.</p> <p>Comments on Paras 21 – 42: add a new heading “Background to the Vision for Salisbury”</p>	

VISION

Respondent name	
Wiltshire Council	
Respondent comment	
Vision & Objectives (Figure 3)	<p>The Vision and Objectives need to provide a clear framework for the Neighbourhood Development Plan.</p> <p>The Vision feels like it has forgotten about the economy of the city. The Vision should also mention the importance of tourism and Wiltshire Creative to Salisbury.</p> <p>The para on water management is unclear as to how is it going to be achieved, maybe a reference to the River Park would be useful here – ‘through the delivery of future phases of the Salisbury River Park project’.</p>
	<p>It is important when reading a Plan that its underpinning objectives can be easily identified. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn to explain succinctly the intention and rationale of the policies in the draft NDP.</p>
NDP response	
<p>This is a difficult comment to interpret. It sets out a statement about what a vision and objectives should be but does not comment (except for employment, tourism and water management) on the actual Vision for Salisbury. It is therefore unclear what is being objected to or what an acceptable remedy might be. Also, is this saying that the evidence is not proportionate – if so, why not?</p> <p>In attempt to address this vague criticism, a table will be created that lists vision against policies but there can be no certainty that this is what the LPA is seeking.</p> <p>The vision discusses tourism and working patterns so this aspect of the comment is not understood.</p>	

Respondent name	
“Material” planning matters raised about the Vision taken from Part 2, section on commonplace free text comments (highlighted yellow)	
Respondent comment	NDP response
1. introduce limits on hard landscaping for all properties	This is addressed in the Design Guide starting at para. 100.
2. I'm also not sure how having mainly no vehicles in the city centre will work for those who live in the centre & need to drive & park. There are also many businesses in the centre who need immediate access to	The Vision has been adjusted to remove reference to “car free” which has proven to be controversial in many of the responses.

<p>their vehicles throughout the day to respond to their business needs</p>	
<p>3. Any new building should be eco and innovative not a rehash of medieval or Victorian, the new buildings should be sympathetic but modern</p>	<p>Policy 6 allows for well designed non-traditional buildings. The Design Guides seek to promote good design and accommodate climate change adaptations.</p>
<p>4. A lot of disabled people do not need mobility scooter, but still require the provision of disabled parking</p>	<p>This is not something that the NDP can affect because it is a transport policy. However, the reference to “car free” has been removed from the vision.</p>
<p>5. The footpath on brown street is too narrow</p>	<p>This can be addressed when the NDO is being prepared.</p>
<p>6. With electric car use there is no need to restrict car movements and rely on cycling and walking</p>	<p>Car movements also cause severance, making town centre locations unpleasant and/or dangerous for pedestrians. It is still important to try to promote sustainable transport.</p>
<p>7. youth hostel and hotel accommodation</p>	<p>Policy 27 supports new accommodation provision but para 350 notes that the youth hostel has been lost. If the YHA wishes to apply for permission for a new youth hostel, it would be supported by this policy.</p>
<p>8. We need to keep Salisbury's historical qualities yet inject innovative, unique and inviting attractions that make people proud to live here and want those living outside the area want to travel easily to the city.</p>	<p>There is no specific policy on attractions but it is hoped that overall, the NDP will provide a fertile basis for new development proposals.</p>
<p>9. Access to Churchfields is the elephant in the room. HGV traffic is damaging the fabric of our historic city. It may be difficult legally to restrict this without an alternative access but this should be investigated . An alternative access should be included in the plan as an aspiration. Diversifying development in Churchfields will not achieve this</p>	<p>Policy 16, through the Churchfields masterplan, is seeking to encourage residential development in Churchfields which should, it is hoped, have a lower traffic impact. Other than that, the NDP is limited in how it can affect transport matters because this is the remit of the Highways Authority. An alternative access is not possible given significant environmental constraints.</p>
<p>10. Regeneration needs to be included as well as sustainable, as existing needs to be rectified.</p>	<p>The NDP seeks regeneration through its design policies and site allocations.</p>

<p>11. If centre is car free, access for local businesses needs to be considered and clearly shown to be an issue."</p>	<p>Reference to "car free" has been removed from the vision.</p>
<p>12. Making the city car free is a terrible idea for residents and businesses alike</p>	<p>Reference to "car free" has been removed from the vision.</p>
<p>13. It will put strain on the roads that aren't car free, most of which are resident lined (rampart and tollgate for example), causing bottlenecks and problems for residents to return home and park. As a SP1 resident, if cars were banned, I would seriously think about moving and we only tend to use the car at weekends.</p>	<p>Reference to "car free" has been removed from the vision. Cars will not be banned.</p>
<p>14. removing car parking will just stop people with young children in the villages coming in to town</p>	<p>The NDP is not and cannot remove parking. However, if WC who owns the car parks wishes to redeveloped them (such as has been proposed at Brown Street by WC in the past) then the NDP sets out policies how this could be achieved. Brown Street, if redeveloped, will continue to provide some parking.</p>
<p>15. What about infrastructure for those that are unable to and are disabled? You cannot assume that every person having difficulty walking has access to a blue badge. I have 4 disabled people in my family and only 1 has qualified for a blue badge to date. However if cars were banned from city centre they would be unable to walk, don't have access to wheelchair and are too unwell for public transport.</p>	<p>Reference to "car free" has been removed from the Vision.</p>
<p>16. Lack of accessible parking could encourage shoppers to go elsewhere</p>	<p>Reference to "car free" has been removed from the Vision.</p>
<p>17. A LOT of people come into Salisbury from surrounding villages and it's not remotely practical to suggest we all get the bus into town (especially when you live in say, Bulford, and it already takes half an hour by car and you have two children in tow).</p>	<p>Reference to "car free" has been removed from the Vision. The NDP cannot affect public transport delivery which is the responsibility of Wiltshire Council.</p>
<p>18. As a family we have a full time wheelchair user and 2 electric cars, we live in a surrounding village; our bus service is awful, irregular and unreliable (and often inaccessible to wheelchairs due to inconsiderate prams), there are NO high</p>	<p>Reference to "car free" has been removed from the Vision. The NDP cannot affect public transport delivery which is the responsibility of Wiltshire Council.</p>

<p>speed car chargers in town and wheelchair access is disgraceful</p>	
<p>19. The above statements regarding travel and transport do not appear to have taken into account people with young children or who are carers and rely on driving and suitable parking near facilities</p>	<p>Reference to “car free” has been removed from the Vision. The NDP cannot affect public transport delivery which is the responsibility of Wiltshire Council.</p>
<p>20. We travel from rural villages. We’ll just go elsewhere</p>	<p>Reference to “car free” has been removed from the Vision. The NDP cannot affect public transport delivery which is the responsibility of Wiltshire Council.</p>
<p>21. The concept that all visitors must be forced onto public transport is totally wrong-headed - shoppers and visitors will simply go elsewhere</p>	<p>Reference to “car free” has been removed from the Vision. The NDP cannot affect public transport delivery which is the responsibility of Wiltshire Council.</p>
<p>22. I would welcome efforts to encourage start ups and innovative retail hubs such as food halls, activity centres (like the Bunkhouse for teens) and studio or small retails spaces for empty stores, including big spaces like Top Shop. More independent shops and retail like in Bath will attract more people to town, creating a virtuous circle.</p>	<p>Unfortunately, the NDP cannot do much to encourage new business start ups which would be better done through WC economic development activities.</p>
<p>23. Emphasis will be placed on local wealth creation and support for enterprises which do not extract resources (financial, human, natural) from the city and its environs.</p>	<p>Planning policy cannot generate wealth creation but the NDP is seeking sustainable development which has social, economic and environmental objectives.</p>
<p>24. Redundant buildings and spaces will be made available for community use ensuring that the city and wider area is not blighted by empty and derelict properties.</p>	<p>Planning policies and case officers cannot dictate to landowners how they will use their properties but can only react when proposals are put forward. The NDP seeks to be flexible towards redevelopment of redundant buildings, particularly in the shopfront design guide.</p>
<p>25. Space in the city and surrounding area will be made available for community gardens and allotments, encouraging people to grow food and create a greener and more nature-friendly community.</p>	<p>The NDP has a policy on allotments and seeks to identify a significant number of local green spaces. However, the NDP cannot “make land available” except as part of major housing schemes without allocating land for this purpose which would require a call for sites. Resources did not allow for this.</p>

<p>26. Encouraging new shops and businesses to city?</p>	<p>The NDP seeks to provide a fertile environment for inward investment. WC's economic development team would be better placed to encourage new businesses to choose Salisbury.</p>
<p>27. The plan as it exists is unsound. Those preparing it have failed to implement the requirements in the NPPF with regard to flooding. The Churchfields site, The former Gasworks and the Former Imery's quarry site are all subject to groundwater flooding. The NPPF requires that a sequential test is carried out prior to any sites being allocated within a neighbourhood plan. This has not occurred and the plan is therefore unsound at present. If a sequential test were carried out on these sites all would be found unsustainable as there are sequentially preferable sites available outside of the City in areas that do not flood.</p>	<p>The Environment Agency did not object to the NDP policies. A sequential test for Coldharbour Lane is in preparation in support of the NDO. The Design Guide para 100 addresses drainage. Otherwise, flooding is regarded as a strategic matter that is beyond the purview of neighbourhood plans. The site allocations have been removed.</p>
<p>28. Er - could you have a go at putting more of this in plain English please? I have a PhD and I thought it rather densely-written, using a lot of shorthand that many respondents won't entirely understand. Too many virtue-signalling words as well.</p>	<p>Apologies for the language of the NDP Part 2 and supporting documents – these are technical planning documents and are written in “planning language” and not plain English. Part 1 was a plain English guide.</p>
<p>29. Covered walkways and covered car parks with solar panels, as are common in Europe, are a huge opportunity to increase local sustainable energy supply while protecting people from the wet in winter and from the heat in summer.</p>	<p>The Design Guide para 94 addresses the matter of solar panels on roofs. There is no available evidence to support that a requirement for covered walkways is viable and it therefore cannot be added to the design guide at this time.</p>
<p>30. Regarding cycling infrastructure improvements, it is no use proposing city-based improvements without firstly addressing the issues cyclists face when travelling to or from Salisbury via the A36, particularly west of Skew Bridge. The A3094 at Park Wall is another dangerous road wholly unsuitable for cyclists; further down, past the Quidhampton junction, the road is also dangerous for pedestrians. Time, and time again these matters have been identified, and acknowledged, but nothing is ever done. If the City and Wiltshire</p>	<p>The NDP is precluded from considering land outside the Salisbury parish boundary. Where these routes fall within the boundary it is a matter for the Local Transport Plan and the LCWIP (Local Cycling and Walking Infrastructure Plan) prepared by the Highways Authority to address. Unfortunately, there is only limited scope in planning to address these matters of highways safety.</p>

<p>Council want to change attitudes to car use, then they need to focus upon the real issues – it’s not just about Salisbury. The A36, a “strategic artery” is maintained by the Highways Authority, and that is why nothing gets done; the A3094 is Wiltshire Council’s responsibility, yet nothing has ever been done to improve road safety for pedestrians and cyclists.</p>	
<p>31. No mention of area-wide wi-fi. No mention of hydrogen fuel, insulation, or how to manage in extreme heat</p>	<p>Area wide wi-fi is not a planning matter and is installed by infrastructure providers. The Design Guide discusses building materials.</p>
<p>32. Incentives should be offered to owners to bring into use currently unused buildings (much of Castle Street for instance) which could allow for Three Chequers Medical Practice to have their much-needed integrated relocation for instance.</p>	<p>Planning policy is reactive. Incentives should come from WC’s economic development team.</p>
<p>33. Deciding that cars and parking are not needed is foolish and caters for the time-rich retired at the expense of families and the working age. A commitment to enabling easier car journeys and parking for residents, acknowledging that their lives and needs are legitimate, should stand alongside ideas for pedestrianisation in the city centre. It would make Salisbury much more liveable.</p>	<p>The NDP did not say that parking and cars are not needed – the vision will be adjusted to remove the reference to “car free”.</p>
<p>34. Sustainability and climate change should not be the first priority. Making Salisbury more prosperous and life better for residents should be the first priority. Prosperous, fulfilled citizens will enable sustainability as a secondary aim. The anti-car measures are insulting to the many Salisbury residents trying to live busy lives. They favour the time-rich wealthy and retired over those working and raising families, trying to get that better job a bit further away or give their kids varied experiences in a narrow free-time window. The plan should get off its high horse and acknowledge the basic legitimate needs for car travel for residents. It should seek to enable neighbourhood residents to live their lives to the full, not get in their way and tell them what is good for them. The</p>	<p>The steering group, following actions by the City Council and WC who have acknowledged the climate emergency, has determined that climate change is the first priority.</p>

<p>proposal to encourage car-free, no parking provision development in the city is failing every family's need for housing and favouring the already well-catered-for retired.</p>	
<p>35. Salisbury needs more independent shops</p>	<p>The NDP seeks to encourage flexibility and good design in its policies but cannot force investment in any particular land use.</p>
<p>36. I see very little on how Salisbury will attract and retain business. Without increasing employment, young people will continue to move out of Salisbury to areas where employment choices are greater. Salisbury should have a clear focus on how to attract new businesses to the area.</p>	<p>Reference to “car free” has been removed from the Vision. The NDP cannot affect public transport delivery which is the responsibility of Wiltshire Council. The shopfront design guide and Churchfields Masterplan seek to make business investment decisions clearer.</p>
<p>37. It is not enough to protect views of the spire as existing views of the Cathedral are valuable too. Developments that still show the spire but hide the rest of the Cathedral are not acceptable.</p>	<p>The cathedral is in a conservation area and as a rule, planning decisions will reflect views of the cathedral when considering local character.</p>
<p>38. It is important to ensure all areas are safe to travel in regardless of time of day or if on foot, personal safety is often an issue when developing environmental targets with street lighti</p>	<p>The NDP does not make any comment on street lighting.</p>
<p>39. One thing I would highlight, the building of developments in the City centre without parking allowance. I have seen two developments of this type in Hampshire. One in Emsworth and one in Bishopstoke. The end result of them is inappropriate parking all over the place by the people who live in the developments, WHO STILL HAVE CARS. If you are making it a rule of living there that no cars are owned, OK, it will work. If not, as I said before, the people who live there with cars will just be trying to park them anywhere nearby. It's a disaster.</p>	<p>The policy only supports the lack of parking provision where applicants wish to promote this – it does not prevent parking provision from being made. It will be up to applicants to decide how they wish to address parking matters.</p>
<p>40. a concerted effort needs to be made to make it an attractive place for young graduates and people in their twenties and thirties. Could there be a push for more rental accommodation suitable for house shares rather than couples? More affordable housing? We have friends who</p>	<p>The NDP specifically refers to the need for housing for younger people and offers innovative approaches to live/work units. Policy 16 and Policy 16 specifically address younger people.</p>

recently moved to Salisbury who found it very hard to find a house they could rent together not as a couple.	
41. High quality hotel and restaurants needed in city centre	Policy 27 addresses the need for hotels but there are not any policies specifically for restaurants. The latter is a matter for private investment decisions but is not discouraged by policies in the NDP.
42. A feature which attracts visitors IN, are small independents which create interest, variety, something different	This is more a matter for economic development by WC than for the NDP.
43. signposted as a ""Mediaeval City"" but with all the junky-looking shops that the planners are letting in, it sure doesn't live up to its billing. Compare with other places that ensure that the character of the town or village is preserved, no matter what the business is internally.	The Design Guide and the Shopfront Design Guide should address this.
44. How will new, higher paying employers be attracted to the city? We have a community that needs to travel to Southampton, Winchester, London or Bath for decent, well paid, professional employment	This is more a matter for economic development by WC than for the NDP.
45. The use of "green" can be confusing with what is actually meant- do you mean climate or do you actually mean traditional green areas like parks etc	This will be borne in mind when reviewing the draft.
46. is it not possible to exert some creative thinking around the many empty commercial spaces that exist?	This is more a matter for economic development by WC than for the NDP.
47. A very aspirational plan which leaves big questions unanswered. Example: Churchfields-it works as a big employment hub because of the synergy between so many different but linked businesses. Where are the ideas to support and enhance large scale employment, apart from the Hospital & Porton Down, without which Salisbury just becomes a "nice" city in which to live and attract tourists?	This is more a matter for economic development by WC than for the NDP. The Hospital and Porton Down are outside the neighbourhood area and therefore cannot be addressed in the NDP.
48. A car free centre must be better planned than the previous scheme. Roads and pavements in the City Centre are too narrow for cycle lanes or other provision. Local buses are so unreliable and park and ride so infrequent that car parking must be	The People Friendly Streets has not been revived in the NDP but walking and cycling are still being supported according to national policy. Matters of parking, park and ride and congestion are not

<p>preserved and not built on. Houses should not be built on green fields - use the numerous empty buildings in the City Centre. Residential roads should not be used as main roads</p>	<p>planning matters but must be addressed by the Highways Authority. The NDP seeks to provide alternatives to development on greenfield sites. There are no proposals to use residential road as main roads.</p>
<p>49. The biggest general theme in regard to improvement was the desire for community and social activity. Among the suggestions were a better cinema, a city festival, and better options for youth. Having newly arrived in the city with a group of others, the other thing that strikes me is that if Salisbury wants to appeal to people in their 20s there needs to be easier access to shared accommodation. A number of friends found landlord's unwillingness to get an HMO license a significant stumbling block to finding accommodation. If Salisbury wants to be a genuine option for younger people, this may well need to be addressed.</p>	<p>The NDP can only support new community and social activity and has a policy to protect community halls. There are many policies (15 and 26 in particular) that seek to make life easier for younger people.</p>
<p>50. Policy 18: Community infrastructure/pubs - If some pubs are finding it hard to survive in the current climate with reduced demand, is the policy saying that the developer should be expected to fund a new loss-making enterprise?</p>	<p>Pubs are actually different from community infrastructure according to the Use Class Order so policy 18 does not apply to pubs.</p>
<p>51. Overall I think that it's good that a plan is being developed but feel that care needs to be taken to ensure that in attempting to preserve/enhance the character of the city centre, steps are not taken which inadvertently inhibit economic growth or make it a less enjoyable/viable place to live or visit.</p>	<p>This is what the NDP is seeking to achieve.</p>
<p>52. More element of Pedestrianisation like the High Street and Queen street are required to meet the needs of residents and visitors enabling a more flexed shopping/vist experience. In addition free Car parking for 1 Hour and payment on exit from all Car parks.</p>	<p>The CAF suggested that a public realm strategy (which would address this issue) should be prepared. However, resources did not allow this to occur in this iteration of the NDP but may be able to look at this.</p>
<p>53. I have lived around Salisbury most of my life but now I am not so keen to bring friends here. So many empty shops, some for years ie Catherine Street far end. All coffee shops, barbers and beauty technicians. They are all lovely, but such a lack of other shopping.</p>	<p>The NDP cannot change prevailing economic trends but it seeks to respond positive to them and not hinder new businesses from starting.</p>

Lack of independent shops for the average shopper.	
54. We have so much potential with many beautiful buildings and some wonderful people, but Salisbury city is not really what a tourist would expect	Noted.
55. The plan needs to be clearer how they will be incentivised away from the use of cars, not merely by preventing car access through pedestrianisation and reduced parking. Some people lack choice in transportation (because of age, health, economics, time constraints, and location in or distance from Salisbury) and so car access needs to be provided at a sufficient level, public transport needs to cover the routes and frequencies necessary at an attractive cost, and footpath / cycleways need to provide an uninterrupted route into and around Salisbury.	The NDP does not prevent car access through pedestrianisation and is not proposing to reduce parking (except at Brown Street redevelopment if that were to occur). The NDP cannot address public transport. The NDP has made provision for walking and cycling but cannot easily address existing routes – this would be a matter for the Highways Authority.
56. Footpaths and cycle paths that keep ending and restarting dissuade people from considering such a mode of travel, not only on that particular route, but in general. And with the growth in e-bikes and e-scooters, pedestrians and cyclists need safer segregation."	The NDP has made provision for walking and cycling but cannot easily address existing routes – this would be a matter for the Highways Authority.
57. We have a problem with new builds being approved by you without parking.	SCC is not the planning authority but noted your concern about policy 25.
58. New builds should NOT be approved without including parking for ALL the flats being built	Policy 25 only supports (but does not require) reduced parking provision in new developments and discourages on-street parking.
59. Biggest change to air quality will be change in vehicle fuels rather than reduction in cars.	Particulate pollution is also caused by tyres but the NDP does make provision for EV charging.
60. Affordable parking and business rents to encourage and enhance footfall to the city centre. Or much more affordable bus fares and improved cycle network and parking for bikes/hire schemes to encourage people not to bring a car into centre. The centre is no longer thriving and I think it is because it is too expensive to stay in and enjoy shops etc	These are matters for WC not the NDP which cannot discuss matters of transport provision, parking prices or business rates (which are set nationally). Rent rates are set by the private sector.
61. It is an admirable aspiration to see the city centre car-free, but without	The NDP will remove reference to "car free" and the remaining

<p>improvement/redesign of the existing ring-road particularly around Southampton Road and the Harnham interchange, any benefits will be severely out-weighed. Southampton Road in particular needs some serious re-consideration as to its layout - it doesn't work.</p>	<p>matters are for the Highways Authority to address.</p>
<p>62. Proposals regarding traffic access to new housing on the quarry via Stanley Little Road need reconsideration. The following factors need to be looked at:</p> <ol style="list-style-type: none"> a. Increase in traffic for 300 to 400 homes will add to congestion and pollution in a built up area where many young children and elderly walk. b. It's already difficult to turn right onto Wilton Road with high volume traffic. c. Road very narrow with parked cars on pavements making it difficult for lorries, bin lorry, emergency vehicles etc. d. How would a bus get down this road to service the new housing estate? e. There is an entrance off the A36 that was used before as access to the quarry, this may be better than increasing traffic in residential area. f. Consider access road being created from the Avenue. g. Where will these new residents shop? They will add to congestion as they will have to shop at Waitrose or Tesco's etc, adding more traffic. h. Dangerous roads. Stanley Little Rd meets Western Way on blind bend, often parked cars, especially on football match days. Already have to reverse and give way on the slope. More cars, more issues, potential for more accidents. Many children cross here to cut across the field on their walk through to school at Sarum Academy. i. Other accidents off Western Way meeting Pembroke Road, vehicles have gone up onto paths and into 	<p>These are all valid concerns and will be considered in the detail of a planning application.</p>

<p>gardens on several occasions. Need traffic calming here, worse with even more vehicles."</p>	
<p>63. Don't force people not to have cars (Churchfields development) they may not use them every day for trips around city, but may need them to travel further afield.</p>	<p>No policies in the NDP will force people to not have cars but sustainable transport alternatives are being supported in order to provide genuine choice in transport modes.</p>
<p>64. Social Housing - the policy would benefit from a stronger commitment to the important provision of social housing</p>	<p>The NDP is very much in support of social housing in policy 15 and in the site allocations.</p>
<p>65. EV charging points - a challenging but key issue for city centre residents, it is a difficult problem that would benefit from more thorough investigation"</p>	<p>Policy 4 addresses EV charging.</p>
<p>66. In the development of cold harbour lane gasometer site please please please adopt marsh lane. It is a complete eyesore and too narrow for modern cars</p>	<p>The NDP cannot adopt roads – this is a matter for the Highways Authority.</p>
<p>67. The right balance needs to be found between having cars in town and making it car free.</p>	<p>Agree.</p>
<p>68. It might be useful if the Plan is adopted to then look in even greater detail at which parts of the NDP area are particularly poorly served with green planting and consider how to alleviate that.</p>	<p>The current evidence is very comprehensive and it is hoped sufficient for the task.</p>
<p>69. Proposals MUST include details of the maintenance and care of trees, shrubs and other plants. Planting should be appropriate in terms of ecological footprint and adaption to weather - drought-resistant, wildlife-friendly - see Sheffield's 'Grey to Green project, for example.</p>	<p>Maintenance of trees is included in Policy 1.</p>
<p>70. Do not write the policy as you have done because it means that it can be easily circumvented. Please please look at it carefully. Think about it mathematically. If someone plants a tree in the each corner of their plot they can easily get the tree to canopy to cover 30% of the plot but it will still be very ugly and not achieve your goals. You need to be a lot smarter. Think about all requirements from the perspective of how will they be tested?</p>	<p>The point of Policy 1 is to increase Salisbury's capacity for natural carbon capture as the priority. There are other policies in the design guide that will help with landscaping provision.</p>

<p>71. No mention is made of native species. Cheap, potentially invasive species which are not part of the natural and historic landscape should not be allowed to take over.</p>	<p>The design guide gives very detailed advice on tree species which are not invasive.</p>
<p>72. There are too many 'get outs'. "Where it is not possible...." who decides it's not possible? If it's the developers, there will never be any trees, it's not in their interest. This needs to be properly enforced.</p>	<p>Planning policies must apply in all situations so in some instances, it may not be possible to deliver a policy clause. It may for instance not be possible or appropriate to plant a tree on a site for a variety of reasons.</p>
<p>73. "There is lack of clarity about the following:- a) How the 18,647 existing homes will move, even partially, to carbon neutrality b) The provision of EV charging points within residents within the city centre "</p>	<p>The figure has been included to demonstrate the enormity of the task of moving towards carbon neutrality. It is, unfortunately, not always possible for residents to put in EV charging points which is why the policy seeks to have charging points put into residential and commercial developments.</p>
<p>74. Trees should be promptly replaced if they die in times of drought (or flood) I think 5 years is too long to leave it.</p>	<p>Policy 1 seeks to do this.</p>

CHAPTER 2: CREATING A MORE RESILIENT CITY IN THE FACE OF CLIMATE CHANGE AND AIR POLLUTION

Respondent name	
Wiltshire Council	
Respondent comment	
Para 35	Page 26 ends by stating that “Resilience to climate change is a focus of the strategy underpinning this plan.” Apart from mentioning resilience in relation to the Wiltshire Green and Blue Infrastructure Strategy this introduction doesn’t really explain what is meant by resilience. If it is a focus of the plan, it might be worth setting out what this means for the neighbourhood plan, in terms of resilience and adaptation to the effects of climate change, including overheating, extreme weather events, drought etc.
NDP response	
Agree. The text will be modified accordingly (para. 35).	

POLICY 1: TREE PLANTING FOR CARBON CAPTURE

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 1	<p>It is well to consider measures to mitigate the consequences of climate change through tree-planting. Aside from the fact that trees and woodland have multiple benefits, strategic measures on Trees, Hedgerows and Woodland will feature in policy in the Wiltshire Local Plan.</p> <p>It will be worth checking if 30% tree canopy cover is achievable on a typical development site, or whether it might be appropriate to ask for a contribution for tree planting elsewhere?</p> <p>You may wish to consider adjusting the wording so that it allows for an appropriate amount of trees depending on the location, and the surroundings. It may be helpful to say in supporting text that a Tree Planting Strategy is being developed by the city council, and consider whether that will help to clarify areas that are suitable for a high or lower proportion of tree planting within new development. In addition, any new significant development should be required to retain or provide green infrastructure including tree planting on site, that will integrate with and enhance the existing Green & Blue Infrastructure GBI network, and new development should be designed with this in mind – it should be about the outcomes the measures are intended to achieve rather than perhaps a specific number.</p>
Para 37	The Task Group has been renamed to “Climate Emergency Task Group”
NDP response	
<p>Correction made to para. 37.</p> <p>Comment on 30% target – the policy allows for an alternative to be provided where the tree planting cannot be provided on site and other policies in the NDP make provision for nature recovery and biodiversity net gain. This policy is therefore not too restrictive. Also, new Green Infrastructure Framework supports the use of targets for tree cover.</p>	

Respondent name	
Wessex Area Team, Natural England.	
Respondent comment	
<p>Policy 1 Tree planting for carbon capture</p> <p>Whilst we support the aims of this policy, we do not feel that it will be effective and may have perverse outcomes.</p> <p>We are concerned that this policy will have the unintended consequence of driving Biodiversity Net Gain towards tree planting when other habitats may be more appropriate.</p> <p>It is not clear who will have the liability to have the 30% tree cover once a development has been built and sold. For example, will private householders be required to (each or in aggregate?) have 30% tree cover. It is not clear how tree cover at year 15 will be calculated at point of planning application determination. While the policies aim may be laudable, we advise the detail needs to be refined for it to be effective.</p> <p>One mechanism trees are impacted by development is through post development pressure to fell trees that are impacting new buildings. To avoid this, the NDP could include requirements for buildings to be built sufficiently far from trees to avoid this. Adopting a requirement along the</p>	

lines of

<https://www.leeds.gov.uk/docs/Guideline%20distances%20from%20development%20to%20trees.pdf> would avoid this, and may be appropriate.

NDP response

Comment on biodiversity net gain and how this could be compromised. Trees also create habitats and have the extra benefit of creating shade and cleaning air. In the urban setting, trees are therefore very desirable. In any event, the NDP provides multiple opportunities and policies for BNG so this policy will not be changed because on the whole, it is important to bring more trees into Salisbury.

Comment on 30%: the policy allows provision to be made off-site if tree planting cannot be delivered on-site.

Comment on who has overall responsibility – this is addressed in the Policy 1 requirement for a management plan which should set out overall management. In any event, planning permission runs with the land so the landowner will bear ultimate responsibility.

Comment that it is unclear whether individual houses will be required to have 30% tree cover – yes, they will but if they cannot, this can be provided off-site.

Comment on how to calculate 30%: the canopy cover of tree species is known and is part of the sales literature of trees when sold so it should be simple enough to calculate how 30% coverage would be achieved.

The Leeds document was checked but it is very specific about sizes and locations of specific tree species. The Design Guide takes a different approach which recommends trees that are appropriate for local soils so the Leeds advice is not very relevant.

POLICY 2: AIR QUALITY

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 2	Basic Condition on general conformity: the NDP needs to take account of strategic provisions (WCS core policy 55) that already exist in respect of air quality and will be reviewed in the Local Plan. If such a local policy such as this is to be retained, clarity is required about how this will complement strategic provisions.
NDP response	
The wording of Policy 2 has been modified to account for Core Policy 55.	

Respondent name
Responses from commonplace website
Respondent comment
<p>Again no consideration of future vehicles being electric. All new homes should be built to carbon neutral standards offering solar panels, heat pumps, triple glazing and car charging points as standard. This needs to commence now not in the future. What is the point in building in antiquity now?</p> <p>Developments must make it easy for people to park their car at the point of entry to the city and not require them to drive about looking for parking. The buildings must not produce combustion products that cause pollution.</p> <p>I'm not keen on the beginning negative - Development must not make the air quality worse - why not say development must contributor to making the air better?</p> <p>-</p> <p>Probably needs to be more specific, as no development is likely to actually decrease traffic movements against an existing baseline.</p> <p>Need to emphasise that improving air quality needs to tackled because of its adverse public health implications current poor levels of air quality is not good for anyone but grim for vulnerable people eg young children fully exposed to that poor air quality on a continuous basis.</p> <p>I have concerns about movement of traffic on ring road and roads leading in. We need a bypass desperately, which would improve air quality and reduce congestion. We also need a multistorey car park to provide safe access</p> <p>-</p> <p>Guys guys guys is this policy to do with air quality? Yes it is. That's it's title. So let's focus on reducing the pollution. Cycling provision is much bigger thing.</p> <p>I know this section addresses air quality but I hope noise and light pollution have also been addressed elsewhere.</p> <p>Needs WC commitment to enforce</p> <p>The need for proper bypass must be acknowledged</p>

NDP response

The NDP does make provision for electric vehicles in Policy 4 but any car with tyres contributes to air pollution despite the fuel used. Policy 3 and the Design Guide try to introduce more climate-resistant development. The NDP cannot affect decision on whether or not to provide a ring road – this is a matter for WC and Government.

The SNDP will not address noise and light pollution and will leave these matters to Core Strategy.

POLICY 3: CARBON NEUTRAL DEVELOPMENT

Respondent name	
Wiltshire Council	
Respondent comment	
Para 56	Please amend to say that Wiltshire Council acknowledged the climate emergency. The pledge to achieve carbon neutrality applies to Wiltshire Council operations only. Instead of a
	<p>'pledging' the council committed to "seek to make the county of Wiltshire carbon neutral by the same date". The reasons given were not those stated in the neighbourhood plan. Please refer to the council resolution for the accurate record https://cms.wiltshire.gov.uk/documents/g11678/Public%20minutes%2026th-Feb-2019%2010.30%20Council.pdf?T=11</p> <p>The explanation of climate change is somewhat confused, mixing the concepts of global warming, with the functions of the ozone layer. Manmade global warming is attributed to an increase of greenhouse gases in the earth's atmosphere, due to human activities. Whilst ozone (O₃) is a greenhouse gas, it is not the main culprit, and in fact has a helpful function in the troposphere as it protects us from excessive UV radiation (this is the ozone layer). At ground level, ozone can form when sunlight reacts with air pollution, and can be problematic for wildlife and humans. Neither of these ozone effects are the cause of global warming and climate change. Please refer to the Met Office for a useful explanation What is climate change? - Met Office</p>
Policy 3	<p>Basic Condition on general conformity: the NDP needs to take account of strategic provisions (WCS core policy 41) that already exist in respect of Sustainable Construction and will be reviewed in the Local Plan. If a local policy such as this is to be retained, clarity is required about how this will complement strategic provisions.</p> <p>The installation of solar panels on the roofs of unlisted dwellings (including within a CA) does not require planning permission, although many buildings within the city are not single-dwellinghouses and therefore it would require permission.</p> <p>'All planning applications' could mean sheds and garages. In any case government policy is that the planning system may not duplicate or demand more than is provided for by planning regulations.</p>
NDP response	
<p>Comment on para 56 – text changed as requested and new footnote added. Additional text added regarding global warming using text provided.</p> <p>Comments on Policy 3: The code for sustainable homes in CP 41 has been withdrawn and the NDP now relies upon building reges Part L. Passivhouse and EnerPHit are more up to date methods of demonstrating energy efficiency and performance alongside BREEAM. The policy has been edited to better reflect the structure of Core Policy 41. Overall, much has changed since Core Policy 41 was adopted and the NDP policy brings CP41 up to date with newer standards and expectations.</p>	
Respondent name	
Comments from commonplace website	
Respondent comment	

The building must have a design life that demonstrates good value over its lifetime. It must follow the nationally agreed codes.

Well that would be lovely but unless the government brings in serious regulations such as the carbon neutral one from the last Labour government, little hope it will have an effect.

-

"National standards unfortunately does not set the bar very high.
Could developments be made carbon neutral (full stop). "

What measures are proposed for upgrading existing properties in the area which far outnumber new builds?

Who are you trying to influence here. If you shake the developer to these kind of statements nothing will get done. It needs to be simple

Building in itself is energy intensive. I would like to see consideration of the materials used e.g. avoidance of concrete where possible, use of renewable resources in building structures.

I wish this were possible but in practice I think it's unlikely

NDP response

This is all covered under policy 3 which has been updated to reflect WC's concerns. The Design Guide discusses building materials with a lower carbon footprint.

POLICY 4: ELECTRIC VEHICLE CHARGING

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 4	<p>Policy on EV has been subsumed within (new) Part S of Building Regs. The trigger of an extra bedroom is unreasonable: why would a 4th or 5th bedroom on an existing house need an EV charger?</p> <p>We suggest considering provisions from a recently 'made' NDP in Wiltshire, that of Colerne (2022):</p> <p>Policy SE2: Electrical charging points</p> <p><i>a. All new residential development where dedicated parking is provided should have an appropriately located charging point. Where general parking areas are included in residential developments, there should be an appropriate ratio of charging points available for general use.</i></p> <p><i>b. Proposals for non-residential developments which provide electric charging points for staff and/or other users will be supported.</i></p> <p><i>c. The installation of electric car charging areas at public buildings with vehicular access and public parking areas will be supported.</i></p>
NDP response	
The policy has been updated to reflect this advice.	

Respondent name
Responses from commonplace website
Respondent comment
<p>"Where practicable" excludes new or modified residences and offices without off-street parking. Where only on street parking is available, the developer should be made to pay for modification of street furniture to accommodate the relevant number of charging points.</p> <p>All new residential development and conversions with addition of one habitable room or more assuming that the development had provision for parking in the first place. Some development is without parking and if this is the case then no reason for a charging point. Ultimate aim is to reduce vehicles moving around in the city area .</p> <p>"Who decides what is "practicable" Surely it can only be appropriate where there is a private driveway or garage or designated parking place. The additional cost to a homeowner doing a loft conversion will be significant and without govt subsidy for the electrical connection costs it seems rather excessive, especially if they do not have an electric car!</p> <p>Possibly electric charge points should be installed when a house is sold rather than modified. "</p> <p>If a residential property has a parking place please try to provision of a charging point to be added in the future when they are at a maturity level acceptable to the building owner.</p> <p>I'm not sure whether this policy is a requirement for each new residential property to be provided with an electric vehicle charging point or whether it is one per development, however large. How will it work for flats? I'm concerned that it could be interpreted as assuming that each household</p>

continues to have at least one private motor vehicle, something that I don't think is sustainable in itself.

yes but the city should also install many more charging points.

I hope you can make this stick. At present Salisbury almost totally lacks charging points. You urgently need to provide public ones.

This may not apply where a house or flat (e.g. in the City Centre) does not have to provide a parking space.

How many parking spaces for charging will each station have? As there is one in the centre does this mean traffic can come into the centre? Or is it for residents in the Cathedral Close?

I would like to see much more emphasis by both Wiltshire and Salisbury City Councils on the promotion and provision of communal or public evcps that charge rapidly and economically and also serve as infrastructure eg for care or health service personnel. Medium and large scale developments are still going through that offer nothing in this regard. Furthermore where is the evidence that all householders want or need individual evcps in which case this infrastructure could be or become an expensive redundant feature.

As long as it doesn't reduce parking, like at the leisure centre. I'm not convinced the electric cars are the way forward or a greenwashing fad, so I'm reluctant about making huge expensive modifications.

-

Let me think. Salisbury council has a vehicle charging point in brown street car park that has been broken for months and maybe years. If the city can't provide a power point then how is it realistic to ask an individual to add one?

There seems to be an expectation that every car in the future will be an EV of some sort and that every residence will have a vehicle. There are other car technologies, such as hydrogen, that may become more common and we should also be trying to wean ourselves off our addiction to cars. We should encourage walking, cycling and use of public transport. Requiring EV charging as described might be excessive, with money being better spent on green landscaping.

When not practically possible for EV charging point on site contribution should be required towards public EV points for use by all.

Not a suggestion, just a comment. I'm not convinced electric is the way forward, but until alternatives such as hydrogen become viable, I guess it's the least worst option.

EV is not the whole answer - we need modal shift too

More thought is needed re how electric car charging points might be provided for residents in the City Centre. Electric cables trailing across the pavement present a trip hazard and a hindrance to wheelchairs and buggies however the cables are protected. There should be a policy to put car charging points for residents in some of the City Centre car parks, e.g. Culver Street. This has the added benefits of (a) giving more space in city centre streets for pedestrians, cyclists etc and (b) encouraging those who live in the City Centre with good accessibility to consider other means of transport - e.g. Car Share.

All well and good emphasizing new developments BUT what about existing residential areas and the total lack of any sensible provision of electric charging facilities or points - street lamps etc.

NDP response

There are good points made here about the provision of EV charging for flats or residences that don't have parking. The policy has been modified at WC's request and hopefully, the support for public EV charging will address this particular issue. Other points have been addressed through the revision of the policy.

POLICY 5: HABITATS REGULATIONS

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 5	It is well to consider measures to mitigate the recreational consequences of development in Salisbury that can affect the New Forest SPA / SAC. Such provision however, being strategic in nature, will feature in the Local Plan as a review of Core Policy 24 (WCS).
NDP response	
This is actually a strategic policy and the NDP will not be changed as a result of this representation. Policy 5 was only included after discussion with the County Ecologist in response to the HRA and how the NDP should address that. It was originally the intention of the NDP to leave the matter of HRA to the LPR.	

Respondent name
Responses from commonplace website
Respondent comment
<p>Houses need to be built to the current approved codes. We need bins to be off the street. Each house needs an allocated parking place.</p> <p>-</p> <p>It's important that phosphate and nitrate pollution is properly prevented, we are seeing a catastrophic deterioration in our famous rivers.</p> <p>The implication seems to centre on the notion that we should have better wildlife habitats within the parish of Salisbury, so that people need not travel to the New Forest! So why not say this in a much more 'explicite' way.</p> <p>-</p> <p>We need a ring road. I wouldn't want additional legislation to make further stumbling blocks for one, as I think it's actually an eco solution to our air quality and traffic problems</p> <p>What are you trying to influence here? This is nonsense. It's easy. You must not allow a new house to be built unless there is an allocation made (by whoever you things should carry the burden) to build more dentists, more schools and more recreational facilities. This can't be something you ask the developer to do. It's your decision.</p> <p>Much tougher planning regulations. If we stopped the mass coverage of our countryside with lego-land fast build houses we wouldn't have to save habitats.</p> <p>Habitat protection is important, but policy should not hinder necessary development</p> <p>I'm sorry I found a lot of this very difficult to get to grips with. I think it means that sites need to be rested/allowed to regenerate at times??</p>

NDP response

The comments are noted and the NDP addresses the matters raised. Sorry it is hard to understand – it is written as a technical document.

POLICY 6: DESIGN IN THE BUILT ENVIRONMENT

Respondent name	
Wiltshire Council	
Respondent comment	
Para 85	Suburbs are both Victorian and Edwardian; trees are not a significant feature of the streetscape of The Chequers (there are none).
Para 89	1904 isn't 'Victorian'
Policy 6	Given that this policy is based upon the Design Guide for Salisbury it appears to complement strategic provisions, notably WCS core policies 57 and 58 (both mentioned in supporting text).
	Moreover, given that class E uses are PD, they are not bound by any local plan policy. Important – please note – WC does not offer free advice to applicants and will not be advising re prior approval applications for C3 or MA conversions. etc.
NDP response	
<p>Comments on para 85: corrections made to text.</p> <p>Comments on para 89: corrections made to text.</p> <p>Comments on Policy 6: The intention of this comment is not clear. If the design guide “complements” Core Strategy policies this implies that it is in conformity with them and therefore meets basic conditions. Planning applications will of necessity also address the CS policies but Policy 6 adds local detail. However, to be on the safe side, the policy will be amended to refer to CS 57 and 58. With regard to wording of Class MA, will clarify that this applies only where planning permission is required.</p> <p>Comment on advice: The Design Guide and Shopfront Design Guide will be amended to ensure that there is no offer of free advice to applicant.</p>	

Respondent name
Wessex Area Team, Natural England.
Respondent comment
<p>Policy 6: Design in the build environment. Design guide for Salisbury</p> <p>Para 54. Note that the Biodiversity Net Gain does not in any way consider species, and so will not incentivise, for example, the installation of swift boxes. If this is an aspiration it should be made explicit. For example, the design guide could say “Unless there is a compelling reason not to, all new developments should include integral nest boxes at a rate of one per dwelling [something for non-residential], to the British Standard for Integral nest boxes. BS 42021:2022.”</p> <p>Paras 55 and 56 are statements of fact, but do not require anything from anyone. It would be good to be explicit as to what the expectation is on developers with regards to these paragraphs.</p>
NDP response
Appropriate text changes will be made to the Design Guide to address this point.

Respondent name
Blue Badge Tourist Guide

Respondent comment

I am a professional Blue Badge Tourist Guide who has been involved in telling Salisbury's story to locals and visitors for over 20 years. The beauty of the historic centre of Cathedral, Close and Chequers continues to attract large numbers of visitors. However, I have become increasingly concerned about the poor visual quality of the Fisherton Street link from the railway station to the medieval city and its effect on the overall image of Salisbury.

The SNDP is an excellent, exhaustive assessment of the present and future needs of the city..

In the section on the Historic Built Environment (Item 89) there is a passing reference to Fisherton Street but no solutions. Item 97 looks at the need for maintenance and replacement of key building elements but with no indication of how this might be helped with public monies. In Part 3 I was particularly interested in reading the Shopfront Design Guide. This prompted an hour long saunter down Fisherton Street to photograph each business and shop front. Disappointingly, this revealed that large numbers of the shops failed to follow the SNDP guide for shopfronts. Many of the fascias were the wrong size, or made of inappropriate materials or painted in garish colours. Much of the paintwork on buildings was fading and peeling revealing bare wood that in few cases was beginning to rot. Victorian and Edwardian buildings that once had contemporary wooden windows now have intrusive plastic windows. The combination of these factors has generated an all pervading sense of neglect and decay that gives the street the feeling of an area down at heel and declining. . There is a complete lack of street art or heritage signage to inform locals and visitors of the area's history and culture. No mention of the former Blackfriars, or witches held in the county gaol, or the importance of the infirmary, or the presence of pilgrims throwing their badges into the river after coming in from the west to visit St Osmund's shrine in the Cathedral, or the former theatre and the former cinema, or of the original eponymous fishermen, or of the bustling activity of the turnpike bringing trade and visitors into Fisherton. From a practical point of view, not all of this heritage art or signage may be appropriate for public display, but surely some, rather than none, would enhance the built environment and make it more attractive and interesting for locals and visitors alike.

Restoring buildings and funding art and information boards costs a lot. Perhaps it would be naive to expect that some of the millions now available to Salisbury could be used to provide grants or low interest loans to businesses or individuals. Probably even less likely would be an offer of a reduction in business rates to those who complete a major refurbishment to the frontage of a building.

The current, two way, traffic plan for the street addresses none of these aesthetic and heritage concerns. All it would do would be to get the visitor in and out of the street a tad faster. Rather than totally pedestrianising Fisherton Street, has the possibility ever been considered of making the street a one way exit from the city to the mini roundabout before the railway bridge (whilst re-routing the incoming traffic along Castle Street)? This would allow for considerably wider pavements that would enable businesses to partially occupy the space in front of their shop, cafe or pub thereby increasing the vitality and buzz of human activity on the street. Almost certainly locals and visitors would be more tempted to pause and sample the delights of a rejuvenated and attractive thoroughfare.

I live in the hope that an increased awareness of the poor physical and aesthetic state of the buildings of Fisherton Street and the lack of public art and heritage signage (and the public's opinion of this) might influence the council's decisions on the street's future

NDP response

Fisherton Street will be refurbished by WC following a successful bid for funding from the High Streets improvement funds. The NDP therefore will not address this matter. When this work progresses, and if at that time the NDP is made, the Fisherton Street improvements will be required to consider the NDP policies. The NDP steering group cannot comment on the availability of grant funding from this initiative and it is suggested that the responder should contact WC directly. Unfortunately, matters of traffic management are also outside the purview of neighbourhood planning and the NDP cannot affect this.

Respondent name

Salisbury Area Greenspace Partnership

Respondent comment

Ch 3

p48 Policy 6 para 3 – Landscape-led design is especially important in a city like Salisbury where landscape setting contributes so much to the character & sense of place – eg NDO sites, Churchfields, the Maltings, new ASDA site. This also needs to be reflected in the Design Guide text. Suggest first sentence should read as follows: 'All major development will be required to either obtain professional architectural **and landscape** design input and/or be subject to an independent design peer review'. In addition, there is a specific clause in policy 6 that requires landscape advice, where appropriate.

P60 Fig 17 map needs updating with strategic view from Lime Kiln Down

NDP response

It is unreasonable to ask applicants to obtain landscape architectural advice in addition to architectural advice. Architects will also be able to advise on landscape except where there are compelling reasons why landscape advice is required which will only be in a minority of cases.

Figure 17 will be reviewed and the steering group will consider whether this new view should be included.

Respondent name

Responses from commonplace website

Respondent comment

"To have regard" is not strong enough . The strategic objectives of the policy should be split into "must haves" and "desirables" particularly in relation to new builds with specific requirements spelt out and referenced to other policies such as climate change.

A lot of conversions will be permitted development weakening any input from the neighbourhood plan but with new builds there is an opportunity to make a difference. With large controversial developments in Harnham coming forward (which evaded scrutiny by SCC owing to boundary issues) there is an opportunity to achieve something more site sensitive and which addresses climate change better than the recent standard developer products at St Peter's Place and Harnham Park. "

I feel that high quality non traditional buildings should be actively encouraged not just permitted in some instances!! Our City will be much improved by not constantly living in the past. Our Cathedral probably would never have been built if these restrictive rules were in place then! We need new modern buildings not pastiche.

"Policy 6: "have regard to" can that be strengthened.

Should be more positive about modern buildings, provided they are of appropriate scale.

New buildings should have character and be special which have an artistic element and are more than utilitarian.

-

Will attract visitors

"Set out specific requirements to address climate change and active travel in a design code. Rather than ask developers to provide screeds of text written to justify how their standard product addresses such matters be more specific about what is expected in the design code. Development on the edge of town needs to be more spacious and leafy than that within the urban area.

Planning evolved from public health measures. All residential properties should have outside space. This means balconies for flats and adequate garden sizes for houses to allow for biodiversity, trees and more sustainable living. (e.g. outdoor drying of laundry uses less energy than a tumble drier, space to grow a few veg gives cheaper access to fresh food)

Reports supporting a planning application are written to justify the developers approach . Remember he that pays the piper calls the tune. "

A positive approach to change and modernity.

The most important element of our built environment policy must be concern for its impact on the natural environment. This means that the highest consideration must be given to making sure that everything, from design, to materials, causes as little harm to the natural environment as possible. This could include measures such as using recycled materials, reducing plastic use, incorporating swift boxes, hedgehog runs, solar panels, etc, etc.

"Salisbury is not a theme park or outdoor museum. New, high quality buildings would enhance the city's built environment more than 'retro' and 'pastiche' design.

Cheap and nasty commercial-to-residential conversions are a blight and should be banned."

This may already be in the document, but it's a lot to read so apologies if I've missed it.I would suggest that any existing building undergoing a refurb (eg if being taken over by another company which needs to rebrand it) complies with the requirements and should not be allowed to use the

existing facade as a precedent. Eg The Debenhams site. It'd be dreadful if it was allowed to look like the Boots building. It should be easy to reflect the era of the building authentically in the design without increasing the cost.

You need to influence properly. Take a look at the city. Which bits need knocking down. Please look at places like Dusseldorf. They recognised that they had a beautiful river frontage that could not be used because of terrible infrastructure. We need to knock down that terrible building between the Masonic hall and the kings head and build something that works with the riverfront. Don't build on the central car park until you sort out the rubbish we currently have. Simple.

"Recognise the historical value of the site of the Blackfriars Friary on Fisherton Street that played an important role in the city's life for 250 years. Rename Priory Square as Blackfriars Square. Commission public art to illustrate their story. Introduce information boards around the parts Sainsbury's supermarket building that refer to the Blackfriars Friary.

Give part of the Maltings (itself a reference to structures long demolished) a new identity. A new sense of place for a forgotten part of Fisherton.

David Richards"

There's a problem clearly with finding suitable re-use for large buildings, such as the old Post Office and Debenhams. High quality property / development advice needed to inform active marketing rather than just waiting to see what turns up.

The forty foot/four storey rule must be safeguarded

-

NDP response

"To have regard to" is a requirement that they specifically address the design guide (which covers many topics that will not be relevant to every planning application). This is actually very strongly worded.

Climate change and active travel are covered under separate policies.

Policy 6 supports modern high quality development.

The NDP cannot commission public art or rename streets.

Maltings Car Park development is subject to a supplementary planning document (WC) and is owned by WC. The NDP steering group decided to not have a policy on the Maltings as a result.

The NDP cannot itself affect economic development – this is a matter for WC.

POLICY 7: THE CLOSE AND ITS LIBERTY

Respondent name	
Wiltshire Council	
Respondent comment	
Para 108	advising re prior approval applications for CS or MIA conversions, etc. The illustration does not show missing sections of wall along the east side of the river; nothing suggests they ever existed.
Para 110	Figure 12 depicts green circles - these are trees, not listed buildings. The figure for grade II* buildings is remarkable (47 in The Close) plus a further 61 entries at grade II. It might be simpler to stress that very nearly every building (other than the modern school buildings of Bishop Wordsworth's School) is listed.
Para 111	Determining the extent of curtilage is a matter for the LPA.
Para 114	Which 'opportunities' does the NDP provide? This perhaps needs better articulation
Para 115	The water meadows do not finish at de Vaux and extend further east, to Britford and beyond. Nearly every alteration to existing or new structure will need permission. The protection provided by PLBCA Act 1990 and WCS CP58 is certainly adequate.
Policy 7	Re-cast of policy is suggested: such measures should not apply to <i>all</i> development. The NDP cannot require anything as regards LBC; it can merely encourage. There appears to be an old footnote (8) in the text in the final paragraph of this policy.
Para 118	More than four meeting rooms. There are also museums, the cathedral archives, Arundells and Mompesson open to the public, several performance / entertainment spaces and two schools.
NDP response	
<p>Comment on para 108 - amend text</p> <p>Comment on para 110 – correction made</p> <p>Comment on para 111 – clarification made</p> <p>Comment on para 114 – additional text added</p> <p>Comment on para 115 – amend reference to water meadows.</p> <p>Comments on Policy 7 – amendment to policy text made</p> <p>Comments on para 118 – new text added</p>	

Respondent name
Responses from commonplace website
Respondent comment
<p>Remove point 2 as it is completely incorrect!!! This point is simply in there to keep the Close NIMBYS happy. See below.</p> <p>Like many other towns and cities Salisbury has a problem with the historic brick houses and buildings being painted with garish white or cream. Buildings in the Close offer particularly horrid examples. Creeping cream will turn us into Custard Town.</p> <p>"I feel that there is a significant amount of commercial activity in the Close which should be acknowledged . The Cathedral school is fee paying and operates as a form of business, as does Mompesson House, at least 4 cafes, Arundells, Museum, Cathedral shop!!!! Yet no mention above of this.</p>

I would like to see the Leaden Hall site developed into a 5* hotel. That would attract \$\$\$ to our City. It can easily be accommodated in a respectful way. Other sympathetic businesses should be able to operate within the Close more easily. We should not be restricting opportunities for our City by creating a no go area in this way. The Close needs to open up more not less. "

Put the natural environment first, ensure all building is environmentally friendly. Any new housing should include a social element, as this is currently an extremely exclusive area, socio-economically.

Some of the artworks installed are completely at odds with the mediaeval character and I think they spoil it. Is there no better place for modern art to be displayed?

The close is already protected by law. You don't need to influence this. You could on the other hand make it accessible only by disabled cars and residents. Why on earth do you allow traffic in and out of the high street. That's just ridiculous. This needs a big think but it can be improved immediately. How was is possible for them to build a traffic control box that has a step to get into it? That's a place of work. The previous guy who worked there for years was on crutches. I always thought what a brave guy he was to be working with his disability. He did a good job collecting money and checking folks. Why are you allowing these things to happen? There are employment codes that demand disable access which have clearly been broken in this case.

-

NDP response

Text has been amended to list the commercial buildings/establishments.

The NDP has a policy on accommodation but cannot force a new hotel to be provided. The NDP has polices on sustainable construction.

The NDP cannot affect traffic orders.

Note: The following email early advice from Historic England (dated 16/04/21) was considered in the preparation of this policy:

I have now been able to consider the draft section on the Close and its Liberty.

It is perhaps useful if at the outset I highlight that we only need to be consulted on the Neighbourhood Plan where and when our interests are likely to be affected. Certainly given the scope of the Plan overall, and our understanding that it is likely to allocate sites for development, we would have an interest in that aspect of its proposals as such provisions can often generate impacts on heritage assets.

But there are no particular issues associated with the Close and its Liberty of particular interest to us at the present, and the draft policy section you have kindly shared doesn't in itself suggest that there might be.

But I do note with interest the issues you have identified in your covering email which do not appear to be reflected in that draft section. The re-purposing and selling of Dean and Chapter buildings has been a bit of theme in recent years but our understanding is that this is not always a problem, and in fact sometimes it is beneficial. New owners invest in maintenance and upkeep that may have been limited previously. Any pressure for increased development (e.g into roof spaces with dormers, or in back gardens) is, to the best of our knowledge, generally well managed via the normal planning controls under the current policies.

But if there is in fact a tendency to consider individual sites or buildings in isolation without having regard to their wider contribution to the special historic interest of the Close and its Liberty then of course over time and iteration the significance of the entity as a whole could become eroded. You don't indicate whether that activity is consistent with the Salisbury Cathedral Strategic Plan 2017 – 2022 and/or the Cathedral's Masterplan "An Exceptional Place" or a departure but if, either way, such activity is at risk of harming the integrity of the area this might, in conjunction with new PD rights, suggest that there is a need for a review of policy or the way in which decisions are made.

If that is the case it is then a question of whether and how the Neighbourhood Plan might address such issues. The fact that the Cathedral's masterplan is cited within the draft policy and that development within its scope would be favoured perhaps indicates that that document remains sound and that the issue is to do with decisions being consistent with it. If this is the case, and given that it has been adopted by Wiltshire Council and used as the basis no doubt of planning decisions, it may be useful to consider a stronger imperative associated with the use of the masterplan to underscore the need for consistency in its application.

In that respect, perhaps something more along the lines of "development will be expected to conform with the Cathedral Masterplan and all other proposals will need to demonstrate that they can be delivered without causing harm to the distinctive and internationally significant historic character of the Close and its Liberty".

I don't cite this as a word perfect illustration of policy formulation, and Mrs Pellegrini is best placed to advise on how any policy should be worded to ensure best practice and conformity with national and local planning policy. I would also encourage liaison with the conservation officers at Wiltshire Council so that those issues which do exist can be accurately identified and substantiated as an evidence base to inform whatever policy is proposed.

Overall, I do wonder whether the proposed policy content of this section of the Plan is adding as much value to the existing planning policy regime as it might. Making policies tighter and more specific, underpinned by appropriate evidence, is the best way to maximise the effectiveness of a Neighbourhood Plan. For example, one building that springs to mind is Leadenhall (Grade I). Once a school it is now empty as far as we are aware, and this section of the Plan might like to think about how it could highlight and best promote the desirability of a secure future for the site.

Unfortunately there is only one of me dealing with all Neighbourhood Plans on behalf of Historic England in the south west so I am limited in the degree to which I can engage in

extended dialogue on any one Plan or issues associated with it. But I would be more than happy to see an early draft of the Plan before formal Regulation 14 Pre-Submission Consultation if that would be helpful.

Kind regards

David

David Stuart | Historic Places Adviser

Historic England | South West

1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ

Direct Line: 0117 975 0680 | Mobile: 0797 924 0316

<https://historicengland.org.uk/southwest>

POLICY 8: THE CHEQUERS

Respondent name	
Wiltshire Council	
Respondent comment	
Para 122	Repeats content of para 120
Para 123	'Butcher' Row not 'Butchers'
Para 124	Reference to 'old swimming pool' not very helpful as there has been no remaining evidence of it for about 15 years. Marsh Chequer is not the only one with an open centre - White Hart, Griffin and Black Horse, for instance. Many had significant development in the C17-C19, behind the principal frontages. The open space where the name seems uncertain is called 'Wyndham Park Open Space'.
Policy 8	The middle of Marsh Chequer is not in the public realm and is not very open, with lots of small fenced plots
NDP response	
Comment on 123 – correction made Comment on 124 – the steering group did not have any evidence to add a new view on Old Sarum Policy 8: policy wording adjusted	

Respondent name
Responses from commonplace website
Respondent comment
"Make the policy more positively worded. : i.e. Any development within the chequers shouldn't and then list the criteria. At present it is confusing and looks as though development which produces a break in the street frontage would be supported when I expect the opposite to be the case. " I'm happy with the intention of the policy but the wording is very unclear. If you intend to support proposals to "avoid the erosion of the traditional back of pavement line ..." then say so clearly. Valuable proposal that needs to be enforced if it goes through. I'm assuming this doesn't change salt Lane car park, which I wouldn't want. For residential properties a slight set back of the frontage behind a wall which follows back of the pavement is advantageous in terms of privacy for the occupants and for somewhere to store the bins as the pavements are generally very narrow. It would also better facilitate the addition of street trees mentioned elsewhere in the plan. Are you kidding me? Look what material was used on the market square. How was that allowed? In the mean time who cares about the street pattern(?). People need a surface on the roads and pavements that works of wheelchairs and buggies. Simple culture and heritage are a key part of Salisbury's identity -
NDP response
Policy wording in first clause will be amended – it is confusing as written.

POLICY 9: PROTECTING VIEWS OF SALISBURY CATHEDRAL SPIRE

Respondent name	
Wiltshire Council	
Respondent comment	
Para 125	Text is a mix between the Salisbury District Local Plan (deleted text and policies) and the Wiltshire Core Strategy. This should be referenced. The section seems to draw heavily on the 2008 Chris Blandford evidence document that was used to inform the policy within the South Wiltshire Core Strategy and Wiltshire Core Strategy. The NDP seems to use this evidence to make the policy less flexible but not using any new evidence.
Policy 9	<p>Basic Condition on general conformity: the NDP needs to take account of strategic provisions (WCS core policy 22) that already exist in respect of Salisbury Skyline and will be reviewed in the Local Plan.</p> <p>The NDP policy can perhaps refer to traditional roofs and materials. The majority of pre-C19 roofs in the city have clay tiles of a red-orange hue; Welsh slate is used elsewhere, and a smattering of lead and zinc, but the dominant character is of the tiles. It is important to strive to retain this. The success of this longstanding policy has been widely acknowledged: The Sustainable Growth of Cathedral Cities and Historic Towns Historic England</p>
NDP response	
<p>Comment on para 125 – this will be better referenced. Yes, it relies upon the Salisbury District Local Plan which is being carried forward as and NDP policy. Now new evidence has been provided because public consultation throughout the preparation of the NDP has shown very strong support for this policy.</p> <p>Comment on Policy 9: Reference to CP 22 has been added along with a new clause about Old Sarum. The title of the policy has been changed.</p> <p>Comment on roofing materials – this will be added to the Design Guide.</p>	

Respondent name
Responses from commonplace website
Respondent comment
<p>Existing taller buildings will never be redeveloped as owners would not want to have to reduce height / lose space. I think height issues must be balanced with the Cities need for housing / parking etc and I'm not sure that protecting views of the Cathedral should be placed as more important than providing affordable housing.</p> <p>Planning permission will only be granted for development that does not exceed 12.2 metres (40 feet) in height, and only pitched roofs clad in traditional materials will be permitted. In some cases building may be required to be of less height.</p> <p>If you do a policy as written you will be played</p> <p>Version of this policy has served Salisbury well over many years</p>
NDP response
Noted.

POLICY 10: ENHANCING BLUE AND GREEN INFRASTRUCTURE AND BIODIVERSITY

Respondent name	
Wiltshire Council	
Respondent comment	
Section: Green & Blue Infrastructure.	In the section on habitat restoration there are several references to native trees in areas which might involve tree planting on-street. The plan recognises the need to develop a species-specific planting strategy. There is concern about the maintenance and adaptability of any new street trees. As part of the development of a planting strategy, specialist advice might be

	sought by the Qualifying Body on whether native trees can survive without high maintenance levels in a warming climate and whether 'near-native' trees should be used which are more likely to survive in urban environments.
Para 140	The phrasing regarding the 10% biodiversity net gain needs to be re-considered as this is a requirement of the NPPF and the environment bill and needs to be in accordance with it.
Para 154	Implication of there being several SACs and SSSIs. The Avon, Wylye, Nadder and Bourne are components of the River Avon SAC and the River Avon System SSSI.
Para 164	<p>The recently published Salisbury Local Cycling and Walking Infrastructure Plan (LCWIP) does include upgrading broken bridges to an LTN 1/20 compliant walking and cycling route, which would include improving existing bridges.</p> <p>A bridge across the Avon south of Southampton Road is not proposed in the LCWIP due to ecological issues and the lack of propensity to cycle here (with improvements to existing routes in this area being a higher priority i.e. along New Bridge Rd / Downton Rd). No objections to a bridge here, but it should not divert any funding away from the priority routes in the LCWIP.</p> <p>The LCWIP also include widening of Town Path which would require replacing existing bridges with wider ones, and either building a platform over the river (which may not be feasible / acceptable) or finding a new route around the Old Mill area. Further feasibility work is required here.</p> <p>The NDP also refers to footbridges providing access for cyclists: by definition, they provide access for pedestrians not cyclists.</p>
Figure 21	Does not note whether the greenways shown are existing or aspirational.
Para 166	<p>Minimum width of 10m for greenways – assumption that this refers to land for planting as well as for the path. The absolute minimum width for any path will be 4m (3m bound surface with a 0.5m low level verge either side), but for locations with higher usage such as town path, LTN 1/20 would require at least 6m (2m footway plus 3m cycleway bound surface with a 0.5m low level verge either side – a green verge or kerb may segregate the walking from the cycling route). Routes that do not meet these standards are not transport routes and may not be accessible for disabled people. Planting trees along any of the LCWIP potential routes may be detrimental to our ability to deliver the Salisbury LCWIP. Such planting should only take place when we can be sure of the exact path alignment, and when we can ensure appropriate species are selected and positioned so as not to damage the pathways. Unsure whether an LTN 1/20 route on the bridleway along Harnham Slope would be supported for example.</p> <p>Some of the greenways are Rights of Way which desperately need funding, but others are routes we have ruled out. This needs to be better aligned with the Salisbury LCWIP (Walking and Cycling Infrastructure Routes (arcgis.com) Local Cycling and Walking Infrastructure Plans (LCWIPs) - Wiltshire Council) although even the LCWIP routes are somewhat indicative). Many of the routes they show have been rejected from the LWCIP for reasons such as ecology, floodplain issues, lack of propensity to cycle or lack of parish council support (i.e. routes crossing into Laverstock). Such proposals should not divert funding away from the LCWIP routes. You cannot increase planting in these areas on the same space that is needed to create adequate walking/cycle infrastructure that would be approved and funded by Active Travel England for example, along Harnham Road or Southampton Road.</p> <p>Some of these routes do align with our proposals and we would want them delivered to LTN 1/20 standards e.g. through site 1 Avon Valley Nature Reserve that is shown in the Salisbury LCWIP and the Greenways map. the route between Stratford Sub Castle and Devizes Road over the River Avon (this is likely to require a 3m shared path plus verges). Any routes</p>

	<p>necessitated by development of sites between Devizes Rd and the River (see site specific comments below) may also need to link to this route.</p> <p>We do not support the delivery of an LTN 1/20 compliant route along the river parallel to Devizes Road. Any route here cannot be LTN 1/20 compliant due to the gradient, unsafe turning movements from Devizes Road to access the path, and difficulties with lighting or putting a bound surface here due to ecological considerations. No amount of money will make this a route accessible for disabled people, and funding from the Transport department of Wiltshire Council or Active Travel England should not be expected for such a route. We have no objection to an unsurfaced or semi-surfaced route being delivered here (and have shown this on the Salisbury LCWIP as a dashed green line) but it will not be the main access route to St Peter's Place (which will be predominantly on existing highway – a route alignment has not yet been determined but it may utilise existing quieter roads through Bemerton Heath).</p>
Policy 10	<p>It is well to consider measures to secure 10% biodiversity net gain. Such provision however, being strategic in nature, will feature in the Wiltshire Local Plan ('Enhancing Biodiversity and Geodiversity'). It is meanwhile uncertain whether policy can apply a presumption against development in respect of green infrastructure; it may be more feasible to seek re-provisioning of any GI lost.</p> <p>It may be sensible to consider separate policies for GBI and Biodiversity (provided that these complement Wiltshire's strategic provisions)</p> <p>Development which consists solely of cycling and/or walking improvements e.g. a new path, should be exempt from this requirement and be allowed to provide no net loss, with compensation measures provided either on-site or off-site. This will otherwise severely hamper Wiltshire Council's ability to deliver infrastructure. Potentially this exemption could be applied to walking and cycling routes which are brought forward by the Local Transport Authority, the city council or a local community organisation (or 'publicly funded' schemes), since Wiltshire Council is already funding biodiversity improvements separately to active travel schemes.</p>

NDP response

Comment on GBI – the Design Code sets out which trees will be appropriate in different circumstances and SCC is preparing a tree planting strategy (March 2023).

Comment on LTN 1/20 – not clear why this is included because this is not in this text or policy????

Comments on Policy 10 – WC was contacted repeatedly asking how best to phrase this policy but the emails were not answered. The Environment Act makes provision for nature recovery strategies which are likely to be overseen by WC but this is at present unknown and not covered by legislation, regulations or national policy. Though the policy intention of Core Policy 50 is strategic, it does not mention specific sites or concerns in Salisbury. Core Policy 50 is also out of date (BAP and catchment area plans for instance). Since CP50 was adopted, the Environment Act has become law. In the absence of any guidance from WC, the steering group prepared this policy based on its local evidence (which has not been questioned by WC). In conclusion, WC are wrong to say that this policy is “strategic” because the NDP is referring to specific sites within the neighbourhood area. However, the wording of the policy will be updated to refer to the Environment Act 2021.

Respondent name

Benchmark Development Planning Ltd, on behalf of Martin Family regarding land at Britford.

Respondent comment

- Para 75 to include reference to landowners
- GBI policies place a “restrictive blanket” over their land. [This is incorrect since their land is outside the NA)

NDP response

- Correct all factual errors
- Amend Figure 21 to exclude land outside the NA
- Ensure that Policy 10 is clearly only meant for land inside the parish boundary/NA
- Amend para 175 to include landowners

Respondent name

Wessex Area Team, Natural England.

Respondent comment

Policy 10: Green and blue infrastructure and Biodiversity

SCC should be fully aware of the liabilities associated with taking a commuted sum to deliver Biodiversity Net Gain, as they will be legally liable to deliver the biodiversity units.

We are concerned that policy is not able to require a developer to fund a specific body to deliver BNG on a specific site.

The policy is silent about onsite biodiversity provision. Does the NDP have a view on what are the habitat priorities for specific sites, or sites in general? The NDP could put forwards specific habitats as priority for the multiplier in the metric.

The policy does not support or safeguard the areas set out in figure 21. It may be appropriate to include in this policy an element along the following lines: Developments which prejudice the delivery of the GBI ambitions as set out in figure 21 will not be supported. Developments which further these ambitions will be supported.

We note that impacts on GBI are to be compensated via the Biodiversity Net Gain metric. Some impacts may not be amenable to such compensation, e.g. impacts on species or on public access. We advise that the policy could include an element such as: Developments should have no net detriment on GBI. Where this is unavoidable, off site measures will be required to ensure that is no net detriment to the GBI network. Supporting text could make explicit that impacts on GBI include loss of visual amenity or visual access to GBI and loss of quality of (say) public rights of way due to development.

NDP response

Our interpretation of the BNG requirement in the Environment Act and emerging regulations is that first, an applicant should demonstrate that they can meet the BNG requirement. This can be demonstrated through provision of baseline ecological information using an accepted metric together with a demonstration that the uplift can be delivered in the proposals. Alternatively, the applicant can provide reference to BNG credits related to sites on the BNG site register for the required BNG uplift, again based on baseline information. However, government have not yet prepared the BNG register for Wiltshire – this has been confirmed in conversations with Wiltshire Wildlife Trust. The NDP is seeking to retain any off-site BNG delivery on sites within Salisbury and not have it be delivered, for example, on a tree farm in Scotland. At the time that a planning application is prepared that must make off-site provision, using Policy 10, the applicant will be expected to contact SCC, but the WC case officer will also be involved, and a suitable agreement, probably through S106, will be conceived. The S106 agreement will make clear how the off-site credits should be delivered and who is responsible.

The policy does not need to refer to on-site provision because this is an expectation of the regulations and also para. 57 of the NPPF “directly related to the development”.

The suggested new wording will be included in the policy and changes to para. 173.

Respondent name

Salisbury Area Greenspace Partnership

Respondent comment

Ch 4

Ch 4 Policies 10 & 11 - agree with Hab Regs that should be merged but is important that there is a policy that references multifunctional GBI

p64 para 134 WC's GBI Strategy was adopted in Feb 2022. Ref 49 needs amending & source info for Fig 18 also on p64

p65 Second bullet point of para 140 – adopted not emerging GBI Strategy. Similar amendment needed in bullet point 4 of para 140

p65 BNG paras 142-143 need to be moved to p75 after para 177. Do not appear to be in the right place particularly if policies 10 & 11 are to be merged as per HRA recommendation. Agree with this recommendation. Policy 10 needs to be a broader policy which relates to the protection of the place-making strategic GBI

BNG sites – obligations for SCC to deliver BNG on the identified sites. This needs to be checked.

LKD should be removed from list as already a good example of a richly biodiverse site

p84 Ch 4 references – not sure what ref 52 is referring to; ref 53 (in para 137) as GBI Strategy adopted in Feb 2022; ditto amend ref 54

p66 para 145 reads better if text in bold is added 'Research **into the state of nature** by the RSPB ...' & ref 58 at this point rather than later in para makes more sense

p66 para 146 – swift numbers in Salisbury need to be checked

p68 para 149 – needs ref to Design Guide re. integral swift brick, hedgehog highways etc

p68 para 150 - add in 'GBI &' before Connectivity

p69 para 156 – omit Fig 55 & insert Fig 22 & Fig 54 in Appendix 1

p70 – bullet 3 – suggest 'Species rich' needs to be added in before chalk downland....; para 158 second sentence – add 'maximise' after 'well connected to'; third sentence - after 'and the Walking and Cycling Connectivity Plan' add 'for sustainable transport' illustrated in Fig 36.

p73 para 170 sentence 5 – after ‘Such plans will’ add ‘be able to’

p74 Omit existing text & agree new text for Policy 10 which needs to be a broader policy relating to the protection of the place-making strategic GBI

p75 para 179 – add after first sentence, ‘The sites are also identified by number in Figure 22 – Open space provision by type in Salisbury’. NE have advised that Lime Kiln Down should be omitted as it is already a wildlife rich site so suggest adding Bishopdown Open Space (site 1 in Figure 22) with agreement of SCC. Relevant Fig 22 numbers added to bulleted list as follows:

- Avon Valley Local Nature Reserve including The Butts (6 & 103)
- Bemerton Folly & Barnards Folly Local Nature Reserve and The Valley Open Space(5, 13, 119 and 120)
- Harnham Slope County Wildlife Site, the Chalkpit, Harnham Folly, The Cliff and Old Blandford Road Open Space(14)
- Middle Street Meadow County Wildlife Site (7)
- Hudsons Field and Three Corner Field (29)
- Bishopdown Open Space (1)

P75 para 180 line 3 – omit ‘valley bottom’

P 82 & 83 – Policy 14 should take up whole of p83 & text on previous page shortened to make sense

p122 Fig 36 Walking & Cycling Connectivity Plan – aspirational spur to Churchfields in wrong symbol & colour & needs to be orange circles. Aspirational greenways/bridges need to be added to Fig 21 & to key – p71

Query whether Fig 42 on p 143 Location of major retailers in Salisbury needs to acknowledge the current planning application for an ASDA on site at London Road. Previous application received approval but was allowed to lapse. Current proposal is for a larger development footprint to include free standing coffee shop with its own parking.

Appendix 1: Environmental base data maps

River names need to be on all maps – currently only on Fig 1a

p159 Fig 51 Topography with rivers & ridgelines needs names of rivers added

p160 Fig 52 Flooding related to Salisbury’s rivers - ditto

p161 Fig 53 Priority habitats – ditto

p162 Fig 54 Land designations etc – ditto

p163 Fig 55 Green space assets – ditto

p164 Fig 56 Connectivity and public rights of way – ditto

Appendix 2 Habitat improvement and restoration schemes

Habitat improvement maps in Appendix 2 to be aligned with text about the sites for easier reference.

Lime Kiln Down to be removed from list as biodiversity has significantly improved in thirty years since site taken out of agricultural production. Proposed replacement site could be Bishopdown Open Space - to be agreed with SCC.

SCC’s awareness of need to accept liabilities for delivering BNG to be checked

Plans of each site to be integrated with text so Fig 65 not required

p168 para 410 line 2 – should read policy 11 not 10; line 3 omit ‘major and noteworthy’

p 169 – 174 Figs59 – annotate more fully; omit Fig 63 & replace with Bishopdown Open Space

p175 Schedule of habitat improvement opportunities to be adjusted/amended accordingly with minor amendments to text

NDP response

The Steering Group and SAGP have completely rewritten this chapter to also include the new Green Infrastructure Framework.

Respondent name

Responses from commonplace website

Respondent comment

The end of this policy statement reads like an offset scheme. I believe there would be little local enthusiasm for schemes which impact green and blue infra directly. However the policy allows the Council to take revenue to offset issues elsewhere in their budget because it somehow calculates a cash equivalent value for biodiversity (which is already hard to measure). A better policy would be to disallow, by default, development in these zones except where explicitly part of climate adaptation needs - I.e. no residential or commercial permissions. This part of the policy as worded does not enhance, it enables erosion at a price.

What is meant by 'biodiversity gain'? Number of species? Plants? Animals? Fungi? Area? Type of Habitat?

10% is too low a target. The net gain will not be monitored over time so a higher target of 20%, as other councils have set, needs to be set. Setting a higher target of 20% in reality will mean 10% will be achieved.

NDP response

See comments relating to WC and EA.

Respondent name
Comment from commonplace website
Respondent comment
<p>"Biodiversity net gain: Page 13, Item 54 states: ""Development proposals should aim to protect and enhance the area of development for protected species, for instance by providing bat boxes, barn owl boxes, swift nesting bricks or boxes etc., as appropriate""</p> <p>Replace the above with the following wording: Development proposals should aim to protect and enhance the area of development for protected species, for instance by providing bat boxes, hedgehog highways and barn owl boxes. Provision for swifts should be provided at a rate of one swift nesting brick or box per residential unit (see 2nd Edition of Design for Biodiversity from RIBA Publications, British Standards Institute BS42021 endorsed by NHBC NF89).</p> <p>Page 15, Item 63: ""Development will also aim to enhance the area for protected species, e.g. by providing bat boxes, barn owl boxes, swift nesting bricks as appropriate.""</p> <p>Replace the above with the following wording: Development will also aim to enhance the area for protected species, e.g. by providing bat boxes, hedgehog highways and barn owl boxes. Provision for swifts should be provided at a rate of one swift nesting brick or box per residential unit (see 2nd Edition of Design for Biodiversity from RIBA Publications, British Standards Institute BS42021 endorsed by NHBC NF89).</p> <p>The current wording will effectively be meaningless in a developer's eyes. Unless the wording is completely unambiguous it can be easily ignored.</p> <p>The wording as appropriate needs removing from both entries as it makes the guidance too weak and easy to disregard. "</p>
NDP response
Made change to policy on biodiversity net gain to refer to habitats, swift boxes, etc.

POLICY 11: HABITAT IMPROVEMENT AND RESTORATION SCHEMES

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 11	<p>It is well to consider habitat improvement and restoration. Such provision however, being strategic in nature, will feature in the Wiltshire Local Plan ('Enhancing Biodiversity and Geodiversity').</p> <p>It may be sensible to consider separate policies for GBI and biodiversity (provided that these complement Wiltshire's strategic provisions).</p>
NDP response	
<p>The CP50 policy does not refer to BNG because it pre-dates the Environment Act. The LPR has to date been silent on GBI other than the GBI strategy which has been used extensively in this chapter. WC's "strategic provision" have therefore not yet been made since the only extant policy does not refer to BNG and there has been no consultation on what the strategic policy might contain with regard to specific sites. In any event, the strategic policy will not be site specific as is the NDP. Therefore, this criticism is somewhat ill founded.</p>	

Respondent name	
Wessex Area Team, Natural England.	
Respondent comment	
<p>Policies 11, 12 and 13. We are very impressed with the data behind greenspaces and site management plans for the 6 sites.</p>	
NDP response	
Noted with thanks.	

Respondent name	
Responses from commonplace website	
Respondent comment	
<p>These are already sites of 'enhanced biodiversity'; they should be the sites from where biodiversity will spread into the rest of the neighbourhood around and near them!</p> <p>This policy does not align with the ambitions for the natural environment set out by the wider relevant policies or strategy for the City or Wiltshire Council. Delivering off-site BNG must look at the whole green and blue infrastructure network of the City, not just those identified in Appendix 3. The bigger the area that is set aside for nature, the bigger the gains on offer. Environmental NGO's and wider partner organisations can support Salisbury City Council identify BNG opportunities locally.</p>	

It's importance to keep habitats, we need to avoid over tidying areas. Sometimes there seems to be too much clearance of undergrowth, maybe to satisfy a need to garden by the volunteer. It can spoil an area, they should be left wild with just small walkways through.

NDP response

Response to second comment: The sites in Appendix 2 are only where off-site provision might be made. The expectation is that the BNG would be delivered on-site.

POLICY 12: OPEN SPACE PROVISION

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 12	Strategic provisions for Open Space will feature in new policy in the Wiltshire Local Plan.
NDP response	
That is good to know but the policy has not yet been consulted upon so the NDP must rely upon its own data. In any event, any “strategic” provision will not be specific to Salisbury and so it is appropriate that this is addressed in the NDP. There is no open space policy in the core strategy.	

Respondent name	
Responses from commonplace website	
Respondent comment	
The more connectivity between Green spaces the better, pedestrian /cycling priority for crossing roads between areas should be a priority	
It's fair that these new developments should help funds for maintenance but what about the existing and seemingly minimal funds that are already provided at the moment - they need to be increased!	
NDP response	
Noted	

POLICY 13: LOCAL GREEN SPACES

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 13	If an area is already protected it is worthwhile considering the merits of an additional layer of designation. Existing designations include: AONB; SPA/SAC; SSSI; local nature reserve; Ramsar site; registered historic park & garden. Process-wise a suggested and simple methodology is as follows: <ol style="list-style-type: none"> 1. Assess area 2. Evidence why areas need to be LGS 3. Contact the landowner
Figure 66, p160	The designation of Local Green Space within Neighbourhood Plans requires underpinning evidence and justification, which needs to be a little more rigorous than that appended within the Regulation 14 iteration.
NDP response	
Figure 66 is sufficient justification for local greenspace designation. All the categories listed in the column “typology” provide justification according to para. 102 of the NPPF. It is not clear what “a little more rigorous” means in this regard. With regard to the comments for policy 13, a new paragraph will be added to the text to demonstrate why all the spaces referred to meet all three criteria set out in NPPF102.	

Respondent name
Response from commonplace website
Respondent comment
A concerted effort to improve Churchfields could incorporate this. I was so pleased that the character of the Town Path is not going to be altered
NDP response
noted

Respondent name
Response to separate consultation on Local Green Space Designation (email from City Clerk, 17 January 2023 copied as Appendix 8 of Part 2).
Respondent comment

Stephen Berry
Chairman
Salisbury Lawn Tennis Club
Old Blandford Road
Salisbury
SP2 8DQ

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3rd March 2023

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For the attention of
Annie Child
City Clerk
Salisbury Neighbourhood Plan Steering Group
Salisbury City Council
Salisbury
Wiltshire
SP1 1JH

¶
¶
By email to: planning@salisburycitycouncil.gov.uk

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¶
¶
Dear Sirs,

Salisbury Neighbourhood Plan (SNP)
Representations on behalf of Salisbury Tennis Club regarding the possible designation of the Club site (the Site) as Local Green Space.

¶
We refer to your email of 17th January 2023 in which you advise the Club that the Club site (the Site) had in 2022 been designated as Local Green Space (LGS) in the draft Salisbury Neighbourhood Plan. You state that unfortunately you omitted the prior consultation with the Club required by the National Planning Policy Framework (NPPF) and you have permitted the Club until 10th March 2023 to make any representations.

¶
Please therefore accept this letter as the Club's response. We would ask you to note the interest of the Club's trustees namely HH Keith Cutler, David Booth and Michael Brodie.

¶
In this letter italics are used to highlight text extracted from Government and Natural England publications. Emboldening is to highlight the words or expressions of particular significance for the issues we are addressing.

¶
EXECUTIVE SUMMARY

- ¶
a. → **The consultation.**
The consultation process is deficient as we would expect to be provided with your rationale for the draft designation. No designation criteria has been provided and you have not provided us with examples of the evidence which you have relied upon.
- ¶
b. → **The character of the Site.**
The Site is developed as a private tennis club with substantial building construction and installation works which have been the subject of several planning consents. Over 80% of the surface of the site is covered with buildings, hard courts, car parks, driveways, concrete paths, court fencing and floodlight pylons.

¶
c. → Amenity and access.¶
 The Site provides tennis facilities for its members. Members are not drawn principally from the immediate community. There is no public access. There is very limited external visibility of the Site which is not visually attractive and does not provide natural features, benefits to the natural environment or access to nature. It is not a space important to the public. ¶

¶
d. → Open space¶
 It is questionable whether the site can be correctly regarded as open space for the purposes of planning legislation and policy. The site has no public element, public value, or public access and has minimal visibility from the public realm. It therefore falls outside the definitions and descriptions of public space in planning statute and policy. ¶

¶
e. → Green space¶
 Green space is not defined in statute or policy so that the first requirement is to give it its natural and literal meaning which is land covered or substantially covered in grass vegetation or trees. Characterisation of the Site, of which approximately 16% is grass, as green space defies this natural and literal meaning and is in conflict with the references to green space and green infrastructure in the relevant guidance, policies, plans and frameworks published by UK Government and (on its behalf) by Natural England. ¶

¶
f. → Local Green Space designation¶
 The proposed designation of the Site as Local Green Space is incorrect because ¶
 • → The Site is self-evidently not 'green space' which is the NPPF pre-requisite to its being considered for LGS designation. ¶
 • → Even if the site were green space (which it is not) the Site does not meet the criteria for LGS designation at para 102 of the NPPF. ¶

¶
g. → How to deal with sports clubs and sports facilities. ¶
 It may be that the LGS designation has been suggested out of a concern to maintain the provision of public and private sports facilities in Salisbury. The NPPF (para 99) provides powerful policy tools for achieving this aim quite independently and separately from green space characterisation or LGS designation. ¶

¶
h. → Implications for the Club of LGS designation.¶
 Treating the Site for planning purposes as analogous to Green Belt (the consequence of LGS designation) would be seriously prejudicial to the Club's ability to maintain improve and enhance its provision, despite the concessions to new construction and replacement in Green Belt policy. ¶

¶
 ¶
 ¶
 ¶
REPRESENTATIONS¶

¶
1. → Consultation and Process¶
 ¶
 1.1. → We are concerned that you have not provided the Club with any information to enable it to understand the basis of the LGS designation. You have set out paras 101 to 103 of the NPPF and have provided a copy of the SNP LGS map but i) you do not say why you consider that the Club site is, in the first place, 'green space' or a 'green area' (as required under 101) or ii) how you say that the criteria for LGS designation in 102 have been met. Neither is there any help in this regard in the draft SNP. It is feared that the draft allocation is the result of a desktop mapping exercise rather than a detailed consideration of the characteristics of the site. ¶
 ¶
 1.2. → Accordingly we do not consider that your communication meets the reasonable expectation for initiating a genuine consultation particularly (as in this case) with a landowner/occupier for whom an LGS designation would be of the gravest significance. ¶
 ¶

- 1.3. → Would it be possible please to provide us with your reasons and evidence as above and the notes or minutes of the relevant discussions within your SNP team?
- 1.4. → As is common with plan-making processes we might expect to see an assessment matrix or other form of assessment criteria which lead the Neighbourhood Plan Steering Group to making this draft designation. Also, can you please advise whether anyone had visited the site or taken photographs?
- 1.5. → When preparing the Neighbourhood Plan, we would expect the Neighbourhood Planning Group to follow national Planning Practice Guidance, specifically: *Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan*

2. → CHARACTER OF THE SITE.

- 2.1. → A cursory review of the plan provided below, in which we show the respective surfaces and buildings on the Site, immediately illustrates why Salisbury Tennis Club is not a green space.

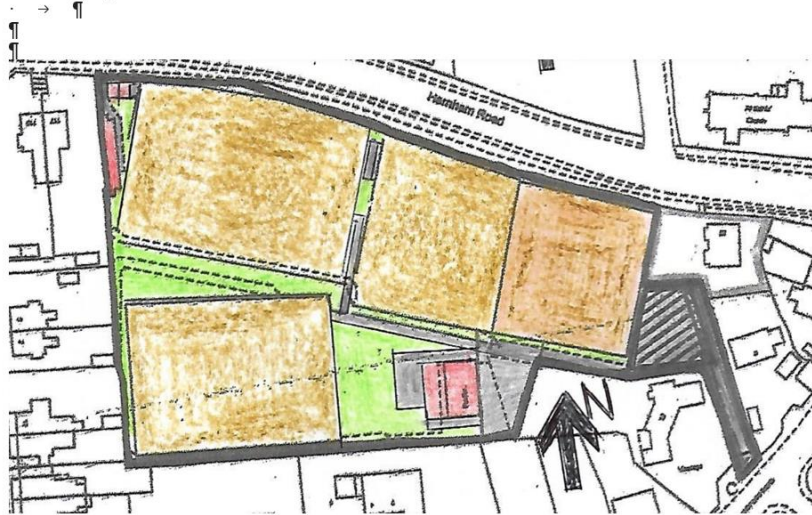


Fig.1.
Key.

Green. Mown lawn or otherwise planted areas. Please note that there is a hedge along the southern boundary and a line of trees along the northern boundary. The Highway Authority is not clear as to whether or not most of these trees are within the Club property. In Figures 1 and 2 we have not included the narrow steep bank immediately adjacent to the south side of the courts in the south west corner as this is not reasonably accessible (other than by the groundsman) but in any event this is an insignificant area in the overall plan.

Pink. Buildings (clubhouse, store, building for irrigation and floodlight controls, irrigation storage tank).

Planning Practice Guidance—Para.040 Reference ID:41-04020160211

Grey (including hatched) - Drives, car-parks and concrete-paths.

Brown - Hard-courts.

2.2. → The surface area of the Site breaks down approximately as indicated in Figure 2.

10 hard-courts	Coated asphalt with concrete and/or aggregate base.	5697-sq. metres.
Buildings	This includes the clubhouse, the paved area which provides the outdoor facility around the clubhouse, the storage building and the floodlighting and irrigation hut and the irrigation tanks.	341-sq. metres.
Car-parks and driveways	This includes the driveway from Old Blandford Road, the first car park, the driveway between the car parks, and the second car park.	1028-sq. metres.
Concrete-paths	This includes the concrete paths giving hard access to the courts and a small concrete or paved seating area between the two westernmost sets of courts on the northern boundary.	190-sq. metres.
Grassed areas	These include the lawn to the west of the clubhouse, and the four strips of grass (one between the two sets of courts on the northern boundary, one giving access to two of the courts on the southern boundary, one running along the western edge of the north-west set of courts, and a very narrow verge to the driveway between the two car parks).	1450-sq. metres.

Fig. 2.

2.3. → The percentage of grassed or planted (green) area to the total area of buildings, hard-courts and other concrete and asphalt areas is therefore approximately 16.5%. If inaccessible areas are included, then the percentage of the Site which is not built on may approach 20%. As can be clearly seen from the plan above, the site is not a 'green' area.

2.4. → **Development and construction.**

2.4.1. **Planning.**

The Site has had the benefit of a number of planning permissions including for the installation of the floodlighting and other related facilities when the clay courts (the set of three courts in the north-west corner) were built in approximately 2000, the building of the new club house in approximately 2010, the installation of floodlights on the two eastern-most courts on the southern boundary in approximately 2016, and previous floodlight installations.

2.4.2. **Extent of building, construction and erections.**

Figure 3 provides an indication of the extent of building and construction works on the Site together with the approximate volume of building materials introduced. It is clear from the information provided below that the site is principally hard surfaced site.

Hard-court playing areas	Concrete/aggregate/asphalt. This does not take account of the layers which make up the playing surface. The total area is 5697-sq. metres as shown in Fig. 1.	We have taken an average depth of court construction of 215mm in accordance with LTA guidelines and assumed 2.4-metric tonnes per cubic metre for a total area of 5697-sq. metres. 2572-metric tonnes.
floodlight pylons (8metre)	nine	We have assumed approximately .25 cubic metres (0.6-metric

		tonnes)-of-concrete-per-floodlight- anchor.-So-approx.-5.5.-tons-of- concrete.□	⌘
floodlight pylons (10metre)□	twenty-four□	25-tons-of-concrete-anchors.□	⌘
Court-fencing.□	Metal-mesh-chainlink-fencing-2.7- metre-height□	451-metres-of-fencing.□	⌘
Court-fencing□	As-above-but-3.7-metre-height□	116-metres-of-fencing.□	⌘
Court-fence-stanchions□	Approximately-80mm-angle-iron.□	Approximately-162-fence- stanchions.□	⌘
Fence-stanchion-anchors□	Construction-code-requires- approx.-120mm-x120mmx- 600mm=-.054-cubic-metre□	Total-concrete-installed-for-162- stanchion-anchors.9-cubic-metres- =22-metric-tonnes.□	⌘
Substrate-for-car-park-and- driveways□	Assume-120mm- rubble/aggregate-and-25mm- tarmac□	Approx-volume-150-cubic-metres.¶ ¶ 300-metric-tonnes□	⌘
Concrete-paths,-paved- areas-around-clubhouse- and-clubhouse-foundations□	Assume-normal-footings-for- clubhouse-and-paths-at-100-mm- of-concrete-and-say-100-mm-of- compacted-rubble□	190-sq.metres-of-paths-at-200mm.- 265-sq.-metres-of-clubhouse-and- surround-at-approx-average-depth- 300mm.-Total-volume-approx.-120- cubic-metres.-Weight-approx.-290- metric-tonnes.-□	⌘
Retaining-wall.□	A-block-retaining-wall-runs-along- the-52-metre-southern-perimeter- of-these-courts.□	Average-height-of-retaining-wall-3- metres.-Assume-600-mm-footings.- Length-Assume-400-width.- Volume-including-foundations-113- cubic-metres.-Weight-(at-say-2- metric-tonnes-per-cubic-metre)- approx.-226-metric-tonnes.□	⌘
Floodlights□	Floodlight-control-system.- Housed-in-the-northwest-corner- of-the-site-and-operated- remotely-from-the-clubhouse.□	This-operates-42-individual- floodlights-(six-lights-for-each-of- the-7-floodlit-courts)-using-33- separate-pylons.□	⌘
Irrigation□	The-set-of-three-courts-in-the- northwest-corner-of-the-site-are- of-american-clay-and-require- regular-irrigation.-□	These-courts-were-installed-with- an-irrigation-system-and- associated-drainage.-This- required-extensive-pipework-under- these-courts-and-several-outlet- points-which-can-be-used- individually.-The-controls-and- pumps-are-situated-in-the-building- in-the-north-west-corner-of-the-Site- (next-to-the-irrigation-tank)-and- can-be-controlled-remotely-by-a- hand-held-device.□	⌘
Hitting-wall.□	Timber-and-steel-situated-on-the- eastern-edge-of-the-north- eastern-set-of-courts.□	Approximately-3m-high-by-5- metres-wide.□	⌘
Total-materials-excluding- the-above-ground-structure- of-the-buildings-and-weight- of-fencing-and-pylons.□	□	3,660-metric-tonnes.□	⌘

¶
Fig.-3.¶

¶
2,5- → **Amenity and access.**¶

2.5.1 → The Site is covered as to all accessible areas by hard standing (courts car parks driveways and paths) and buildings save for approximately 17% which is principally mown lawn.¶

2.5.2. → Parts of the northern area of the Site can be seen from the first floors of the residential properties situated along the southern and western boundaries of the Site.¶

¶

2.5.3. → Because of the steep drop to Hamham Road along the northern boundary the Site is not visible to pedestrians or those using motor vehicles on that road.¶

¶
2.5.4. → The southern boundary is separated from Old Blandford Road by residential property so that users of Old Blandford Road cannot see the Site.¶

¶
2.5.5. → The Site is not a visual attraction and contains no noteworthy landscaping, or protected trees.¶

¶
2.5.6. → The Site provides no natural resources or access to nature of any significance and does not enhance the natural environment.¶

¶
2.5.7. → The predominance of hard surfacing naturally limits the biodiversity value of the site.¶

¶
2.5.8. → Given that up to approximately 83% of the Site is developed the Site does not provide any significant contribution to flood prevention, air quality, nature recovery or other environmental benefits.¶

¶
2.5.9. → The development and hardstanding is not superficial. The construction of these facilities has involved the introduction of approaching 4000 tonnes of concrete and other substrate materials, and extensive and prominent above ground installations over many years.¶

¶
2.5.10. → The Club is a private 'members' club (it is held by trustees on behalf of the members) and there is no public access. Guests and visitors attend by invitation of the Club. Whilst this in itself does not prevent the designation of the site, there are no other considerations which would lead to the site's designation, i.e. wildlife, historic significance and / or beauty.¶

¶
2.5.11. → The Site does not provide any visual attraction or amenity to the community or enhance the natural environment.¶

¶
2.5.12. → The site is not known to be 'demonstrably special' to the local community.¶

¶
2.5.13. → At figures 4 and 5 are photographs which will help you to see the extent of development and physical obstruction.¶

¶
¶
¶
¶
¶

¶
[redacted]
¶
[redacted] ¶
[redacted] ¶

¶
[redacted] ¶
[redacted] ¶

¶
[redacted] ¶
[redacted] ¶



Figure-4.



Figure-5.

¶
¶

3. OPEN SPACE¶

- ¶
- 3.1. Whilst public access is not a prerequisite for the identification of 'open space' for planning purposes, private land must have significant public value that can be enjoyed/appreciated from the public realm for that identification to be supportable. For example: i) the 2014 'Guidance on Open Space, sports and recreation facilities, public rights of way, and local green space', (which is the guidance on the application of the NPPF) states 'open space includes all open spaces of public value'. ii) the Town and Country Planning Act 1990 states 'open space includes all open spaces of public value'.¶
 - 3.2. Inspection of the Site readily evidences that it does not have any biodiversity, historic, architectural or landscape value and in any event visibility of the Site from the public realm is extremely limited.¶

¶

4. → GREEN SPACE.¶

¶

- 4.1. → The Site cannot be characterised as 'green space', or a 'green area' in accordance with any of the relevant guidance, policies, plans or frameworks, or following any sensible valued based judgement about the characteristics of the site.¶
- 4.2. → The NPPF and the 2014 Guidance are clear that only 'green space' or 'green areas' can be considered for designation as LGS under para 102. For example: Para 101 of the NPPF states '*The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them*'.¶
- 4.3. → We are not aware of any definition of green space in statute or government policy (including in the NPPF). Further the 2014 Guidance and NPPF refer variously to '*green areas*', '*green space*' and '*greenspace*'.¶
- 4.4. → In such circumstances the first rule of interpretation is to apply the literal and natural meaning and we hope it is common ground that '*green space*' or '*green area*' would in the first instance be assumed by any reasonable person to refer to land that is wholly or mainly down to grass vegetation or trees and contributes significantly to the natural environment and to access to nature.¶
- 4.5. → Para. 102 NPPF can only reasonably be read as assuming such characterisation of 'green space'. Para c) requires, for the purposes of LGS designation, *that a green space should have 'a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife'*¶
- 4.6. → Characterising as 'green space' a site which is approximately 83% covered with hardstanding/concrete and has extensive and significant vertical structures and installations, is incompatible with the use of that expression in the relevant guidance, plans, policies and frameworks. (For example: it makes nonsense of the headline ambitions/commitments of the Government's 2023 Environment Improvement Plan (EIP23)). These also corroborate the literal and normal meaning of 'green space' as suggested in 4.3. above. We provide some examples as follows.¶
 - 4.6.1. Glossary in Annex 2 of the NPPF '*Green infrastructure: A network of multi-functional green and blue spaces and other natural features*'.¶
 - 4.6.2. Para 92 of the NPPF. '*The provision of safe and accessible green infrastructure*'¶
 - 4.6.3. Goal 10 of the EIP23. '*To deliver these [enhancing beauty heritage and engagement with the natural environment] we will: • Increase the accessibility of green and blue*

spaces..... Create or significantly refurbish over 100 green spaces through the Levelling Up Parks Fund.

4.6.4. Introduction to the EIP23. *Targets and commitments. We will: Work across government to fulfil a new and ambitious commitment that everyone should live within 15 minutes' walk of a green or blue space. Our actions include: 1 Improve access to nature – creating new routes, more green and blue spaces and increasing their accessibility to people of all backgrounds. This will help ensure that everyone has the opportunity to connect with nature. We suggest that it cannot be intended that this commitment is fulfilled in respect of a person living within 15 minutes of the Site which is not green and which has no public access. It does not provide any connection with nature.*

4.6.5. Introduction to the EIP2023. *Good quality green infrastructure is important for health and wellbeing, air quality, nature recovery and for delivering net zero targets, as well as for adapting to climate change by providing urban cooling and reducing flood risk. We will make green and blue spaces more inclusive and support more people to benefit from nature and Green and blue spaces can support communities through providing opportunities for a diverse range of people to connect with nature.*

4.6.6. Natural England Green Infrastructure Framework. Introduction. *The pandemic showed..... how many people do not have access to high quality green space close to home. The Green Infrastructure Framework..... will help local authorities and others target (to) Green Infrastructure improvements where they are most needed – a vital step in levelling up access to nature.*

4.6.7. Natural England Green Infrastructure Advice. *the Green Infrastructure Framework is a powerful tool to help deliver the Nature Recovery Network by planning for and investing in space for nature in our urban areas*

5. LOCAL GREEN SPACE DESIGNATION.

5.1. The Club's position is that it is not correct even to consider the Site for LGS designation as LGS designation is only available (101 NPPF) for land which is green space. The Site is self-evidently not green space.

5.2. However, addressing, apart from the impossibility as identified at 5.1, your proposed LGS designation (pursuant to 102 NPPF), we comment as follows:

5.2.1. The Club is at a disadvantage as you have provided no reason, or any evidence or assumptions relied upon for the proposed application of para 102 so the Club is prevented from addressing these specifically.

5.2.2. Criteria a) and b) at 102 NPPF read as follows: *the [LGS designation] should only be used where the green space, is (a) in reasonably close proximity to the community it serves; and (b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.*

5.2.3. With reference to para 5.2.2, we say that we have shown in these representations that (quite irrespective of the impossibility of the Site being regarded as green space) the Site does not

in any event serve 'a local community', is not 'demonstrably special to a local community' does not hold a 'particular local significance', and cannot reasonably be considered as having any aspect of the attributes or character which the provided examples are intended to convey, for the purposes of LGS designation..¶

¶
¶
¶

6. → HOW TO DEAL WITH SPORTS CLUBS AND SPORTS FACILITIES.¶

¶

- 6.1. We have pointed out earlier that the 2014 Guidance and the NPPF do not equate sports clubs or sports facilities with open space or green space and that they are referred to separately and are the subject of different policy tools in the NPPF and the adopted Wiltshire Core Strategy.¶
- 6.2. The Club acknowledges that the planning authority has a legitimate interest in seeking to maintain and enhance the amount of such provision and that there are constraints upon the Club and its trustees were the Club to propose, for example, to carry out residential development on the Site.¶
- 6.3. The policy tools available to the planning authority in this regard are set out at para. 99 of NPPF and policies 49 and 52 of Wiltshire's Core Strategy. In summary the planning authority should resist development save where i) the facilities can be shown to be surplus, ii) the development is to enable new equivalent facilities to be established on a different site, or iii) the development is part of the improvement or enhancement of the facility.¶
- 6.4. The Club does not have any argument with these policies and considerations. The Club exists only to provide tennis courts, tennis coaching, tennis events, related club facilities and activities for its members and visitors and guests and the Club constitution and the Club Trust would not permit any application for permission to develop which did not accord with the second or third requirements in NPPF 99.¶
- 6.5. The interest of Salisbury City Council and of the planning authority in this regard do not require the designation of the Site as Local Green Space (even if such designation were appropriate or lawful).¶

¶

7. DAMAGE TO THE CLUB'S LEGITIMATE INTERESTS.¶

¶

- 7.1. If the suggested Local Green Space were to go ahead then the NPPF states that planning policy should treat the Site as analogous to Green Belt.¶
- 7.2. We are aware that green belt policy would enable the planning authority in appropriate circumstances to grant permission for buildings or other construction which enhanced or extended the existing facilities, but this is nevertheless subject to constraint.¶
- 7.3. However with the planning policy towards Local Green Space being analogous to Green Belt the Club would almost certainly be prevented from applying for permission for development even where this would have met the considerations set out at para ii) of NPPF 99. This would be extremely unfair to the Club which can have no interest in development other than to enable it to extend and improve sporting facilities. It is also unfair because the NPPF expressly provides that government policy is to allow development of sports club facilities where this is the means of building improved facilities in another suitable location.¶
- 7.4. There is a further element of the damage to the Club of LGS designation and consequent Green Belt treatment. This is that the value of the Site would be so severely diminished that the Club may well have difficulty borrowing for major works which need to be carried out from time to time. The borrowing, which has run to several hundred thousand pounds over recent years, is subject to being able to offer the Site as security. The future development of the Club will require the Club to borrow very substantial amounts.¶
- 7.5. Equally the Club would be seriously disadvantaged in making a case for the residential development of a discrete part of the site in order to raise funds to enhance the sporting facilities or introduce new sporting facilities.¶

¶

¶

¶

¶

8. → **SUMMARY**¶

We hope we have persuaded you to review the proposed LGS designation on the grounds that, i) in view of the nature of the Site, the designation is not supported by or compatible with the relevant policies, guidance, plans and infrastructure, and ii) you have other strong policy tools to enable the planning authority to control development on the Site in the interest of maintaining the provision of sports facilities. We hope also that we have explained why the designation would have the most serious implications for the legitimate interests and future of the Club.¶

¶

Please do not hesitate to contact me if you have any questions or require any further information.¶

¶

¶

Yours faithfully¶

¶

¶

¶

¶

Stephen Berry¶

Chairman of the Management Committee¶

Salisbury Lawn Tennis Club.¶

¶

..¶

¶

¶

NDP response

The site will be removed from the Local Green Space list on the grounds that it is not accessible to the public (private member's club) and is substantially developed with hardstanding.

Respondent name

Response to separate consultation on Local Green Space Designation (email from City Clerk, 17 January 2023 copied as Appendix 8 of Part 2).

Respondent comment (email exchange)

RE: Letters to landowners for Local Green Spaces



andrea@pellegram.co.uk
To: 'B Smith'
Cc: 'Annie Child'; 'Cllr Annie Riddle'



Mon 30/01/2023

This message is part of a tracked conversation. [Click here to find all related messages or to open the original flagged message.](#)

Hi Barry

No, the designation would not impact on these planned improvements. All these proposals maintain the openness of the land and retain its value to the community.

Andrea

From: B Smith <bls@bishopwordsworths.org.uk>
Sent: 24 January 2023 10:44
To: andrea@pellegram.co.uk
Subject: RE: Letters to landowners for Local Green Spaces

Dear Andrea

Thank you for the explanation and I see the concern for the (unlikely) event of the School closing and the land being used for development. For now, though, would this designation impact on our plans for using the playing field e.g. rebuilding the pavilion or creating a small section of all-weather surfacing on the site?

Regards
Barry Smith
Bursar
Bishop Wordsworth's School

From: andrea@pellegram.co.uk <andrea@pellegram.co.uk>
Sent: 18 January 2023 15:48
To: B Smith <bls@bishopwordsworths.org.uk>
Subject: FW: Letters to landowners for Local Green Spaces

CAUTION: This email was sent from a mailbox external to BWS. Please be extra vigilant when accessing this email. Attachments should only be opened from known senders if you are expecting them. Never open an attachment if it is in any way suspicious but instead forward the email to ICT.

Dear Barry

I am the town planning consultant supporting the City Council in this matter and I thought that it would be helpful for me to contact you directly.

The purpose of the designation is to keep this land open for the foreseeable future. The site is currently a playing field and as such it has some protection from being converted, for instance, to a housing estate. The loss of the land would be detrimental to the community.

As long as the school continues to operate on that site, the playing field is protected. However, should the school close and the land be sold, the playing field would become vulnerable.

The purpose of the designation is therefore to provide protection of this valuable open land future the future community.

If you have any more questions, please feel free to contact me on the details below.

Best wishes

Andrea

From: B Smith <bls@bishopwordsworths.org.uk>
Sent: 17 January 2023 13:49
To: Planning <Planning@salisburycitycouncil.gov.uk>
Subject: FW: Letters to landowners for Local Green Spaces

Dear Ms Child

Thank you for the email about local green spaces and I see that our school playing field (plot 83) is a candidate for designation as such. From the information you have provided, I do not fully understand what the impact of this would be. Could you please point me to some further information.

Regards
Barry Smith
Bursar
Bishop Wordsworth's School

From: Planning <Planning@salisburycitycouncil.gov.uk>
Sent: 17 January 2023 12:22
Subject: Letters to landowners for Local Green Spaces

NDP response

Noted and no changes made.

POLICY 14: CONSTRUCTION AND DEVELOPMENT MANAGEMENT FOR PROJECTS AFFECTING THE RIVER AVON SAC

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 14	Being strategic in nature, the recreational consequences of development in Salisbury that can affect the River Avon SAC will feature in the Local Plan as a review of Core Policy 69.
NDP response	
Noted.	

Respondent name	
Wessex Area Team, Natural England.	
Respondent comment	
<p>Policy 14 Construction etc. affection the R Avon SAC</p> <p>Natural England is very supportive of the strategy green/blue infrastructure overall and we support the idea of nature reserve status for the river valleys.</p> <p>185 (page 80) states that The citation for the SAC identifies the qualifying habitats i.e.. the characteristic floating vegetation... This is not accurate as it is not the floating vegetation that is the habitat. The wording in the citation is ‘water courses of plain to montane levels with the <i>Ranunculon fluitantis</i> and <i>Callitricho Batrachion</i> vegetation. (Rivers with floating vegetation often dominated by water crowfoot)’.</p> <p>Paras 187 onwards are quite difficult to read and would may benefit from some editing.</p> <p>188. River Avon ‘and its floodplain’ which... It is the ‘floodplain’ element of the river feature that provides most of the ecosystem services – wetland habitat for wildlife, pollution filtration, carbon sequestration, flood protection, groundwater recharge, and fertile soils for farming. The river alone provides clean water for drinking, business and farming, aquatic habitat for wildlife and fishing and other quiet recreational activities.</p> <p>189. I think the quote is either ‘the river is the floodplain’ or the ‘floodplain is the river’ – ie. the floodplain, which is formed by sediment deposited by the river, is the area that is covered by water (the river) in times of flood. Therefore need an ‘and’ – The ‘river’ is the river and floodplain and is an integrated system that has evolved over time. Or reword as ‘<i>The floodplain is an integral part of a river that has evolved over time and is essential for a healthy functioning river system</i>’.</p> <p>We advise amending the sentence about the River Park as the project is not ‘preserving’ ecosystem services in this context. It is providing flood protection by modifying the river channel and creation of a bund – ie. to stop the floodplain from flooding. It is, necessarily in this location, constraining the floodplain (rather than making space for it to function and deliver those ecosystem services) but within those constraints it is providing minor floodplain re-connectivity (Fisherton) and some really good nature based health/wellbeing and recreation benefits.</p>	

So split the sentence To preserve..... its floodplain. Then delete the part about *as the Environment Agency are planning*. Then incorporate into 191. *The restoration of the riparian area of the River Avon in the Maltings area and Fisherton Recreation Ground as part of the Environment Agency's Salisbury River Park Project is a significant opportunity...*

Also 191. Do not think 'possibly' is needed – 'potential' at the start of the sentence.

192 It may be worth expanding this section as it is something that needs further investigation and addressing. Macro and microplastics are well known in terms of pollution that persists for many decades, but fewer people connect this with tyre-wear particles – which are effectively microplastics.

...Agency indicate that road runoff poses a significant threat to river health. Road runoff occurs when pollutants from oil spills and tyre and brake wear of vehicles build up on roads, especially in dry periods, and are then washed into the river when it rains and the existing infrastructure becomes overwhelmed. Runoff can carry over 300 different pollutants including trace metals such as copper and zinc, hydrocarbons and other toxic organic pollutants. Climate change is already resulting in longer dry spells interspersed with heavier downpours and this is expected to become even more extreme which will increase the effects of these pollutants on the river. Road runoff also contains phosphate from various sources such as verges, gardens and car washings. Another source of phosphorus is from misconnections where a property's wastewater is wrongly connected into rainwater downpipes meaning toilet waste and waste water from dishwashers, washing machines and sinks can ultimately discharge to the river.

Separate section on farmland? Delete arable as runoff can be from both arable and grazing systems, so *Water runoff from ~~arable~~ fields can...*

Pesticides can cause pollution but are not a source of nutrients. Is also not just arable – in fact arable may be less polluting in the catchment than livestock therefore suggest: *chemical fertilisers and manures can be washed directly into the river or leached into the groundwater causing damaging... Pesticides applied to crops can also cause pollution issues and can have a damaging impact on our aquatic insect life.*

194 'The trust' – Wessex Rivers Trust?

198 could refer to the Wiltshire Wildlife Trust leaflet: [Garden Meets River's Edge](#) on how to manage the SSSI for wildlife.

199. Core Policy 69/River Park Master Plan / Policy 14. Natural England recommends that this could be framed more positively for the River Avon SAC ie. Construction and Development Management for Projects to ensure protection of the River Avon SAC. Rather than working from the premise of an affect.

Earlier on in this chapter it talks about avoiding development in the floodplain, and in particular the riparian zone and using the River Park as a blueprint yet that ambition seems to have been lost by the time we actually get to talk about development. NE therefore advises that 199 should reaffirm some of those earlier sentiments – along the lines of *Development/redevelopment should aim to integrate the protection and restoration of the natural river habitat, riparian zone and floodplain.*

NDP response
<p>Comment to para 185 – that part of the text has been deleted.</p> <p>Comment to para 188-199- changes made</p> <p>Revised wording for Policy 14</p>

Respondent name
Responses from commonplace website
Respondent comment
<p>Development near the River Avon, such as Site 5 : Land north of Downton road, should be avoided, and does not align with the ambitions for the natural environment set out by the wider relevant policies or strategy for the City or Wiltshire Council. Further development along the course of the river valley will only add to risks associated with water quality, water quantity, and habitat loss.</p> <p>I don't think this is working in current circumstances, just an observation</p>
NDP response
Noted but relied upon response from Natural England.

CHAPTER 5 LIVING INTRODUCTION

Respondent name	
Wiltshire Council	
Respondent comment	
Paras 202-204	The incorporation of an email communication by the Council is deemed to be unhelpful as supporting text within a draft NDP. This can be referenced and form part of the consultation report.
	Throughout the twin-track plan process (Local Plan and Neighbourhood Plan) Wiltshire Council has encouraged the Qualifying Body to seek to bring forward brownfield development.
Para 211 + Table	The Housing Enabling Team provided the information in this table, having undertaken further analysis on the units which had been declared on the LAHS returns as having been granted 'final planning permission'. Paragraph 211 implies that the figures in the table were reported in the LAHS return. However, this is not accurate as we only submit a County-wide figure in the LAHS return which is not broken down by bedroom number. It would be more accurate to say: <i>Wiltshire Council has confirmed that between April 2016 and March 2021, 247 Affordable Housing units, secured through developer contributions, were granted final planning permission (either Full permission or Reserved Matters approval) in Salisbury. The table below gives a breakdown of these units by tenure and bedroom number.</i>
NDP response	
Comment on 202-204 – the quotes will be paraphrased and referred to.	
Comments on 211 – new text inserted.	

POLICY 15: HOUSING MIX AND AFFORDABLE HOUSING

Respondent name	
Wiltshire Council	
Respondent comment	
Para 225	Paragraph 225 suggests that new development should focus on mid-sized homes and that there is 'little need for more one bed accommodation'. For information, the need for 1 bed units currently represents 52% of households on the Housing Register for Salisbury. Since many households will only be eligible to bid for 1 bed properties, it is essential that 1 bed flats form part of the Affordable Rented mix in order to meet need. Once factors such as demonstrable need, current stock and management issues have been considered, the Housing Enabling Team currently seeks to negotiate between 25% and 30% of the Affordable rented units as 1 bed units.
Para 237	The 25% First Homes requirement only applies to developers' Affordable Housing contributions.
Policy 15	<p>Provision on affordable housing, however, being strategic in nature, will be feature in the Wiltshire Local Plan as a review of Core Policy 43.</p> <p>Paragraph 64 of the NPPF requires Affordable Housing contributions for residential developments that are considered to be 'major' development. Major development is defined in Annex 2 of the NPPF as: 'Development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more'.</p> <p>The Affordable Household threshold is therefore:</p> <ul style="list-style-type: none"> • 10 residential units; or • Site area of 0.5 hectares. <p>This should be corrected in paragraphs 236, 245(a), Policy 15 and the Housing Needs Assessment report, which refer to a threshold of 11 units and does not mention site area.</p> <p>On housing mix, meanwhile, Wiltshire Council is aware of the Qualifying Body's evidence on housing need in Salisbury, and it is reasonable that a local approach to this can be provided, complementary to strategic measures provided for in Core Policy 45</p> <p>The tenure mix specified requires 25% of the Affordable Housing units to be delivered as Affordable Rented housing (possibly rising to 40% if the 15% which is unallocated tenure is delivered as Affordable Rented accommodation). This is extremely low and will compromise the ability of Wiltshire Council to meet the needs of Salisbury residents on the Housing Register. Such a split of tenure will be difficult to deliver, especially on smaller scale sites with no guide on the preference when considering different scales of provision: it therefore cannot be supported.</p> <p>Affordable Rent is influenced by the LHA, rather than a flat percentage of market rent. If proposed evidence is provided which shows the relationship between LHA and 30% lower than market rent, it should state 'LHA or 30% of market rent, whichever is the lower'. For</p>

	<p>information: currently 60% of Affordable Housing units are delivered as Affordable Rented units in accordance with current demonstrable need. Nevertheless, the number of households on the Housing Register in immediate need of rented affordable housing has continued to grow from 574 (August 2020) to 587 (August 2021) to 719 (August 2022).</p> <p>Rent to Buy units are not delivered 'in perpetuity' as the intention is that on purchase, they will become market units. They are therefore not considered to be a suitable tenure to be delivered through developers' contributions or on Rural Exception Sites. They could however form part of the Affordable Housing mix on some 100% Affordable Housing sites (other than Rural Exception Sites) in order to assist in the creation of mixed and balanced communities. These sites are delivered by Registered Providers. Inclusion of Rent to Buy units on 100% Affordable Housing sites would therefore be dependent on the Registered Provider being supportive of this tenure.</p> <p>Finally, the policy states that the provision of flats, either market rate or affordable, will be supported. However, it should be noted that evidence demonstrates that Affordable Rented 2 bed flats above ground floor level are difficult to let. This is possibly because most of the households with a 2-bed need include children and therefore favour 2 bed houses with gardens, ground floor access and easily accessible parking. Due to the lack of demand, the Housing Enabling Team does not generally support 2 bed flats above ground floor level for Affordable Rented accommodation.</p>
NDP response	
<p>Comment on 225 – new paragraph added. New clause added to Policy 15. Comment on 237 – text clarified Comments on 236, 245 Policy 15 – text corrected to be in line with wording in NPPF. Comment on Policy 15 regarding mix of affordable housing – the policy wording has been changed.</p>	

Respondent name
Responses from commonplace website
Respondent comment
<p>If this is the one to build on Brown Street Car Park I don't agree at all with losing the car park.</p> <p>It's very important that this policy is enforced. Salisbury will be a miserable and unsuccessful city if the growth in proportion of elderly people continues to be facilitated. So many retirement homes are currently advertised. Developers must be compelled to provide affordable homes for younger people.</p> <p>-</p> <p>"For new developments of more than 5 homes there must be a minimum of 40% affordable homes or first homes. First Homes, for sale or rent, are 30% discounted from market rate in perpetuity. For sites allocated by this plan, affordable flats will be encouraged in sustainable locations. In addition, the council will discourage developments of housing where age restrictions or stipulations for residents exist. Furthermore, the council will adopt a policy to actively promote and create local authority owned residential property available for rent at affordable rents, discounted at 30% below market rate in perpetuity.</p> <p>"An agreement to upgrade Churchfields in a flexible manner incorporating Live Work and other housing would give much needed diversity to what has been promoted for development in recent years</p>

I would like to see some sort of measures put in place that prevent private landlords from buying new build flats, affordable housing or market rate housing, so that renters are not subjected to potential huge rent increases and substandard housing. This provision could be built into the rules alongside limits on increase in market value.

Change of use applications from commercial to residential property should be allowed to meet housing needs and empty properties which are often allowed to fall into disrepair should be investigated by the Council. There are many such properties in the city centre which again could provide homes.

Accommodation in all housing should be built to Parker Morris standards or higher - never lower.

NDP response

All comments noted but changed to provisions were made to policy 15 in accordance with WC requests.

POLICY 16: CHURCHFIELDS AND THE ENGINE SHED SITE

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 16 Churchfields	<p>As outlined in previous communications, the NDP needs to take account of strategic provisions (WCS core policy 20) that already exist in respect of the Churchfields site, which will be reviewed in the Wiltshire Local Plan.</p> <p>The Council has explained this in letters to Salisbury City Council, the last of which concerning Churchfields was dated 21/2/22, and objects to the draft NDP provisions.</p>
NDP response	
Noted. This will be addressed in the Basic Conditions statement.	

Respondent name	
National Highways	
Respondent comment	
<p>Section 5 Living – Policy 16 Churchfields and the Engine Shed site: the Churchfields industrial estate is allocated as a mixed use development site for 1,100 dwellings and 5 hectares of employment by way of Core Policy 20 of the Wiltshire Core Strategy. It is understood that the allocation of other sites in South Wiltshire is thought to enable the relocation of existing businesses located at Churchfields. The pre-submission draft Salisbury Neighbourhood Development Plan appends a Masterplan prepared for the site. Policy 16 would require that development within the area take full account of the proposals and requirements of the Masterplan. Whilst the site does not represent a new allocation, it continues to have the potential to impact on overall traffic patterns, and particularly those at the junction of the A36 Wilton Road/ Cherry Orchard Lane. This will be of interest to National Highways as any planning applications for individual development sites come forward, and we would welcome further discussion with Wiltshire Council and land-owners regarding the proposed development and access strategy for the area.</p>	
NDP response	
Noted.	

Respondent name	
Other responses from commonplace website	
Respondent comment	
<p>"improving Churchfields such that it integrates better within the city, particularly for non-vehicular access, and presents a more accessible and attractive location to a greater diversity of businesses. Sounds good.</p>	

Access for HGV vehicles is certainly poor. Agree pedestrian access to the green spaces around Churchfields could be much better.

Not sure about creating lots of housing / residential use; isn't there something to be said for a concentration of industry etc? I prefer Framework Development Scenario 2.

The policy doesn't specify which scenario should be supported?

"

Not given

I would close down Churchfields as a commercial area

This is up with the Maltings/Central Park as a key area that needs to move from a long term blot on the brownfield landscape

Just not sure where it's all going to go and how it's not going to simply move the issue elsewhere. It is prime real estate and is horrible as is.

This policy may kick start the redevelopment of Churchfields where there has been many plans but no action over years and years

HGVs should be stopped accessing Churchfields through the city centre. This would require a road to dip significantly under the railway.

This is an observation. I personally found it really difficult to understand exactly what is being recommended here. The supporting document is very aspirational but is very low on specific detail as to a Salisbury specific plan. I also think the proposal to mix housing into this development is madness. Churchfields should be relocated outside of the city and the land used for dedicated housing.

Build housing there

Whilst fully supportive of moving traffic intensive business away from Churchfields, it is vital that they are successfully relocated within the Salisbury area, are easily accessible and supported by public transport links

NDP response

Comment noted. However, the way that policy 16 is designed is that it is up to individual applicants to put forward proposals for housing or commercial development.

POLICY 17: HEALTHCARE FACILITIES

Respondent name	
Respondent comment	
Para 253	Agree with the document that Salisbury Hospital is outside the Neighbourhood Plan area, therefore unnecessary to incorporate.
Policy 17	This policy needs to ensure that it retains a Salisbury focus; in general, infrastructure provision to support development is captured by strategic measures in Core Policy 3.
NDP response	
<p>Para 253 – the hospital is outside the neighbourhood area but is the main health provider and employer for Salisbury and therefore should be included to provide context, though it is not included in the policy. No changes made.</p> <p>Comment on policy 17 – this comment misunderstands the intention of Policy 17 which will not be delivered through S106 contributions but as specific proposals for new health facilities. It therefore does not directly related to Core Policy 3. No changes made.</p>	

Respondent name
NHS
Respondent comment
Supplied tracked changes to Healthcare policies and text.
NDP response
The NDP will be updated as appropriate to accommodate the suggested changes.

Respondent name
Responses from commonplace website
Respondent comment
<p>We will support and actively promote the development and increase of health care facilities in the central area commensurate to the population of the these facilities service. This will including populations outside of the central area. NHS Population Health Management data will be used to support all plans. The co-location of health and social care would be welcomed on single sites. We will resist the loss of exiting health care facilities, unless suitable alternatives are identified and available for use before the closure of existing provision. Community Infrastructure Levy funding will be sought to support new facilities from all appropriate residential developments locally.</p> <p>I'd prefer more facilities outside of town that I can drive to when kids and I are sick. Drive through pharmacy PLEASE!!! The beehive would be convenient for a SMP Wilton road style medical facility Healthcare facilities in Salisbury are desperate and new housing developments only make shortages worse. Adding more services and GPs, dentists etc should be a critical priority. Surely should be a condition of any development review that it includes funding and space for healthcare (as well as additional sewage etc capacity).</p>
NDP response

The first comment is a rephrasing of existing Policy 17 except for comment on CIL but this bidding would come from the NHS with WC, and not SCC so no changes made.

On second comment, the policy does not preclude health infrastructure provision outside, just prioritised central location. WC policies will ensure that NHS requirements are met in Core Policy 3.

POLICY 18: COMMUNITY INFRASTRUCTURE

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 18	<p>provision to support development is captured by strategic measures in Core Policy 6.</p> <p>It is not reasonable to expect every 'major' development to be providing all the community infrastructure since the definition is as small as 10 residential units, for example, and would make schemes unviable. The policy needs to be amended to be flexible and more reasonable.</p>
NDP response	
Comment on Policy 18 – wording amended.	

Respondent name
Responses from commonplace website
Respondent comment
<p>We will resist loss of any community infrastructure (e.g. community rooms, pubs) unless alternative provision can be made, preferably in the same ward. Where loss is unavoidable, the developer must fund the replacement. All major new residential developments must provide new community infrastructure on site, or offsite through developer contributions, to enhance the ward to meet the needs of the new residents. Furthermore, Community Infrastructure Levy funds should also contribute to secondary care provision.</p> <p>New developments in the City must provide adequate off road parking. The presence or otherwise of a Pub in a community cannot be mandated for, particularly in the current economic climate.</p> <p>CIP funds continue to overlook the dire need for additional secondary care provision as local populations grow. Additional funding to increase the size of local hospitals does not automatically follow increased local population numbers and this can be witnessed in the pressures experienced by all three acute hospitals within integrated care system serving our local community. Whilst other services are just as important, the complete omission of secondary care is wrong.</p>
NDP response
Comments noted but no changes made. The first comment just rephrases the policy text but in a less precise manner. The policy is not about secondary care or hospitals.

POLICY 19: ALLOTMENTS

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 19	Allotments are already protected through other legislation and this element should be amended accordingly.
NDP response	
Comment on Policy 19 - there may be other legislation relating to allotments but they can still be sold and changed/redeveloped and new allotments are required. No changes.	

Respondent name	
Responses from commonplace website	
Respondent comment	
Developers should allow for new allotment land	
The loss of allotment land will be resisted unless an acceptable alternative is provided. Major residential developments will be expected to make provision for allotments wherever feasible. Omit 'wherever feasible'	
The loss of allotment land will be resisted unless an acceptable alternative is provided. Major residential developments will be expected to make provision for allotments wherever feasible. OMIT 'wherever feasible'	
I would suggest that all new developments have a green communal garden area for local residents, especially where private gardens are so small or people live in flats and have no garden.	
There is a waiting list for allotments so there is the need	
NDP response	
Comment on “where feasible” – it may be that a residential units such as a block of flats or otherwise densely developed or constrained new development will not have excess land for allotments provision but may be able to provide other opportunities for gardening such as rooftop gardens.	

POLICY 20: PROVISION FOR PLAY AND SPORT

Respondent name	
Wiltshire Council	
Respondent comment	
Paras 286-289	<p>Point 286: The Wiltshire Playing Pitch Strategy (WPPS) is due to be renewed, not refreshed (target date end 2023)</p> <p>Point 287: WPPS will put forward strategic sporting / playing pitch & ancillary infrastructure projects aligned to known and predicted future housing growth. The current WPPS has identified the need for a second artificial, all-weather pitch within the Salisbury Community Area</p> <p>Point 289: S106 contributions for youth and adult recreation are sought through Wiltshire Council referring to the Wiltshire PPS (WPPS) priority action plan, National Governing Bodies (NGBs) of sport, NDPs and conversations with Parish/Town Councils. We do not advocate developers contacting local clubs, this will be achieved as part of the strategic process of looking at the contributions</p>
	Surprised not to see the development and upgrade of Churchill Gardens youth and adult recreation listed as a Salisbury CC priority
Policy 20	<p>General infrastructure provision to support development is captured by strategic measures in Core Policy 3.</p> <p>If a local policy such as this is to be retained within the NDP, clarity is required about how it will complement relevant Wiltshire Council strategic policy.</p>
NDP response	
<p>Comment on 286 – correction made.</p> <p>Comment on 287 – this paragraph is an indication of what local clubs wish to see and it is hoped that the renewed WPPS will take account of locally identify needs.</p> <p>Comment on 289 – sentence deleted, and reference to local clubs changed to SCC</p> <p>Comment on Policy 20 – Core Policy 3 makes provision for place-shaping infrastructure. Clause v refers to developer contributions for local facilities. NDP policy 20 sets out local contributions. Clause vi refers to parish councils and how they will identify community infrastructure requirements. Policy 20 is therefore in conformity with Core Policy 20. Not sure therefore what the WC comment is meant to convey. Will add a reference to place shaping infrastructure.</p>	

Respondent name
GL resident
Respondent comment
In observation I support policy 20 but must consider an improvement to quality and quantity of football pitches as there is currently a conflict between open spaces for recreation that has increased through covid and areas that are also used as sports pitches. Especially if these are loaned out to groups that are benefitting financially / running a business from using pitches for free as is the case currently in Harnham.
NDP response
This is more a management than a planning issue.

Respondent name

Responses from commonplace website

Respondent comment

Care needs to be taken that play areas on larger schemes are not in the most polluting or polluted location on a site as has happened on at least one development in believe in Downton.

Please make sure that play spaces are not just designed for toddlers but for a mics of ages and abilities. Equipment should be well thought out and easy to use

We will actively campaign for an promote the creation of new or enhanced sports and play provision in Salisbury. All major residential developments must provide for play (play areas or informal adventure play spaces), which must include sports pitches for very large schemes, and their landscapes schemes should give opportunities for informal play. We will strongly resist the loss of play and sporting facilities in the City.

There is a dire need for additional indoor sporting facilities of a suitable scale and size to allow multi use. The plan should actively seek to develop more of these facilities. Similarly the provision of outdoor facilities available for football training at an affordable costs is very poor. This is particularly the case during the summer months when overstretched council owned facilities are closed to allow then to rejuvenate ready for the next season. This means that clubs are unable to find locations to train during the summer without travelling long distances outside of the area. Larger new developments must be compelled to provide suitable sporting facilities.

NDP response

The third comment is a redrafting of the current wording.
The other comments are addressed in the supporting text.

CHAPTER 6 TRANSPORTATION AND MOVEMENT INTRODUCTION

Respondent name	
Wiltshire Council	
Respondent comment	
Section: Sustainable Transport	It would be helpful for the NDP to provide some support for: improvements to Salisbury Rail Station; for the A360 bus lane to be improved; for a bus route between Britford Park & Ride and Salisbury District Hospital to be delivered; for all major sites to provide bus shelters with seating and RTPI; and for the provision of frequent bus services (at least 4 per hour) from all major development sites into the city centre.
NDP response	
These are transport matters outside the remit of neighbourhood planning. The NDP cannot therefore support (or not support) such provision.	

Respondent name	
RF resident	
Respondent comment	
<p>This is an subject I feel very strongly about. Salisbury is in general a picturesque city with historical buildings and features that not only provides a pleasing environment for the residents, but also helps to attract many tourists along with Stonehenge and contributes substantially to the local economy according to a 2005 report by the Salisbury District Council on Marketing, Economic Development and Tourism.</p> <p>I quote from this report: 'For Salisbury and South Wiltshire to be recognised as a premier UK tourist destination; to sustainably develop and promote the local tourism industry in a way that takes full advantage of our natural and cultural assets and of our heritage such that visitors are provided with a quality experience which makes them want to return and for the benefits of tourism to be enjoyed by all'. This would seem to me to offer some leverage, when it comes to diverting funding toward a greener, cleaner Salisbury.</p> <p>I know this is a complicated area and requires balancing many competing issues. However, I think there are some immediate and growing concerns that affect the residents as well as the aims set out by SDC in wishing to develop tourism further.</p> <p>The direction of travel for the future is not the petrol car. As a newcomer to Salisbury, it is immediately apparent that the city has grown around the needs of the car user. The city centre is quite small in relation to the volume of traffic circulating and this has created some self evident problems: traffic jams, particularly around the A36 and Southampton Rd junction. A sprawling city centre car park, which could hugely benefit from some green spaces. Increased air pollution. And an over reliance on car usage.</p> <p>The cycleways are few and far between and do not really encourage cycle use. Also, they do not seem to link up with each other particularly well. It would be great to see a proper cycle route from Salisbury to the New Forest, for example.</p>	

There are, of course, many issues, but I think the negative impact of transport and movement within the city centre is crucially important.

NDP response

Comments noted but mostly related to transport matters that the NDP cannot address.

Respondent name

HS resident

Respondent comment

I notice there's no mention about vehicle access into and around Salisbury. Salisbury residents are not bothered about holiday makers using the A303 getting to the West Country twenty minutes quicker, we need less traffic on the ring road thus reducing air pollution. The solution is a by-pass.

NDP response

Not something that the NDP can address.

Respondent name

National Highways

Respondent comment

Thank you for providing National Highways with the opportunity to comment on the pre-submission version of the Salisbury Neighbourhood Development Plan. As you are aware, we are responsible for operating, maintaining and improving the strategic road network which in Salisbury comprises the A36 trunk road. In commenting on emerging neighbourhood plans we follow the principles set out within the National Planning Policy Framework and DfT Circular 02/2013 "The strategic road network and the delivery of sustainable development". We also look to apply the guidance set out in "The strategic road network – Planning for the future – A guide to working with Highways England (now National Highways) on planning matters".

It is recognised that the A36 through Salisbury experiences congestion, particularly at peak times, and contributes to air quality and community severance issues. We have therefore been working actively with Wiltshire Council as they prepare their Local Plan Review transport evidence base, to understand the traffic impacts and necessary mitigation measures to support emerging growth proposals. We also continue to support them in bringing forward the sustainable transport measures set out in the Salisbury Transport Strategy and Central Area Framework, and are currently working in partnership with them to identify potential measures to provide improvements to the A36 Southampton Road.

Having reviewed the pre-submission document, in general terms we are supportive of the Plan's approach and associated policies which seek to improve sustainable transport provision, increase active travel, and ensure new development is sustainable and well connected, with reduced

reliance on the private car and reduced traffic impacts on Salisbury's Air Quality Management Areas.

NDP response

Noted.

Respondent name

Response from commonplace website

Respondent comment

We need a proper transport interchange in Salisbury's central car park (Maltings), with a big 'bus station, like at Bath. If it's not done at The maltings, it could be done at Waitrose's site, but that's further from the attractions, and for the future.

Either run a tram/shuttle to the station platform 6, or set aside space to move the railway station (easy in this case) to The Maltings for a comprehensive interchange. One or other is essential.

Add a 3 story car park for shoppers & tourists, subsidised (free?) by business taxes on account of the facility. Price makes a difference - Southampton Road shops are used less when city parking is affordable/free, by me at least.

Whatever might be thought about the desirability of motor cars, plentiful and cheap parking is THE key to keeping visitors and shoppers coming. This is a tourist spot and an overgrown market town after all.

Move the bus, coach, taxi depots here, shopmobility, tourist information etc, 24 hour free toilets & medical health centre. Cycle stands etc. Electric vehicle charging points. You know the list.

There are jammed narrow streets, crazy bus service since closing the previous 'bus station, coach drop-off inconvenience, closing shops (don't need any more). This is a rare opportunity to fix most of this.

Access from the ring road keeps traffic out of the medieval streets which are easy to access on foot.

The existing shops & market are the natural shopping area, there's no need to move the centre, and no need for more shops either large or small.

Developing a transport interchange at the existing railway station is not a solution, and could not have all the necessary services. The Maltings development cannot be viewed in isolation, it has effects on the transport arrangements throughout the City and the region.

Short & medium term money concerns are no way to decide this, which affects a major historic city for all future time. There are deeper heritage issues.

By all means include youth hostel and hotel accommodation along with residential flats above shops, but keep Sainsbury's as is.

Do not move the Library. It's position serves its function. It's function serves its position. It is a free public service, in public ownership. Do not change this. Commercial considerations have no bearing in these matters. The library will die if moved with reduced footfall, do you want that? The art galleries need to be in the same building of course.

Nationally, container traffic could be largely transferred to rail if there were a transfer depot near each town, so only the last mile is by road. This could be at the disused rail yard behind Salisbury station, likewise at Wilton and Solstice Park Amesbury. "

The proposal assumes that the site can be cleared for the "future vision" but it is likely to be decades before it can start to be dealt with as the ownerships are so complex and so many businesses have to be relocated without any feasible alternative. If it can go ahead with some of the existing businesses staying in situ there is still a fundamental issue about access to Churchfields through the city by large vehicles which is so detrimental to it.

NDP response

Comments noted but mostly related to transport matters that the NDP cannot address.

POLICY 21: SUSTAINABLE TRANSPORT

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 21	Basic Condition on general conformity: the NDP needs to take account of strategic provisions (WCS core policy 60) that already exist in respect of sustainable transport and will be reviewed in the Local Plan. If a local policy such as this is to be retained, clarity is required about how it can complement strategic provisions.
NDP response	
Comment on Policy 21 – will add reference to CP60	

Respondent name
Responses from commonplace website
Respondent comment
<p>"The policy assumes that modal shift will come through residential or commercial development, not as a need of itself. This means there is a risk that the LWCIP and the SNDP may not align or be positively incoherent. Simply stating that the SNDP assumes an LWCIP exists isn't strong enough. There must be evidence of close coupling. Further, the SNDP needs to be explicit about HOW it will bring about modal change through core investment in cycling and walking, not just relying on developers complying with policy clauses which all contain a get-out clause. For example, St Peter's Place should not have been approved without the council and developer committing to a funded and timely plan to put active travel solutions in place. The fact this hasn't happened is indicative of incoherence and/or weak planning and approval leadership.</p> <p>The SNDP is also weak on HOW it will work with Highways Agency and County Council to reduce and better manage arterial traffic and better integrate local active travel along those routes. Wilton Rd, Devizes Rd, London Rd, etc."</p> <p>Travel plans are not worth the paper they are written on. Active travel should be addressed through design , including blue/green infrastructure and street works.</p> <p>In theory, Hydrogen will replace electric vehicles. Tree planting for carbon capture is very temporary and no solution. The carbon involved here is already in the carbon cycle. It is "fossil" carbon which we need to keep out of the carbon cycle.</p> <p>It may be necessary give their is a neighbourhood plan, but it's a pity the only reference is to developments. Policy, pricing (road and parking), speed limits, public and private investment, enforcement and all other influencers should explicitly and progressively reverse the current dominance of vehicular traffic that blights the whole of Salisbury and the lives of its residents. Policy should also refer clearly to the health harms that traffic inflicts on the community and the urgent need for cleaner air.</p> <p>"Wiltshire Council and our MP have buried their heads on this and missed an opportunity. The failed ridiculous tunnel past Stonehenge should have been counter offered with a surface by pass</p>

further South relieving both the A303 and A36. The A36 issue is only going to get worse unless Glen & Clewer address it with Highways England.

Clewer has taken the Anti disabled stance discouraging Blue Badge holders from our car parks and damaging our city centre. "

Must be done in a way that doesn't make driving in more difficult. Only achieved with free buses into Centre or multistorey at Central car park.

"We need a proper transport interchange in Salisbury's central car park (Maltings), with a big 'bus station, like at Bath. If it's not done at The maltings, it could be done at Waitrose's site, but that's further from the attractions, and for the future.

Either run a tram/shuttle to the station platform 6, or set aside space to move the railway station (easy in this case) to The Maltings for a comprehensive interchange. One or other is essential.

Add a 3 story car park for shoppers & tourists, subsidised (free?) by business taxes on account of the facility. Price makes a difference - Southampton Road shops are used less when city parking is affordable/free, by me at least.

Whatever might be thought about the desirability of motor cars, plentiful and cheap parking is THE key to keeping visitors and shoppers coming. This is a tourist spot and an overgrown market town after all.

Move the bus, coach, taxi depots here, shophmobility, tourist information etc, 24 hour free toilets & medical health centre. Cycle stands etc. Electric vehicle charging points. You know the list.

There are jammed narrow streets, crazy bus service since closing the previous 'bus station, coach drop-off inconvenience, closing shops (don't need any more). This is a rare opportunity to fix most of this.

Access from the ring road keeps traffic out of the medieval streets which are easy to access on foot.

The existing shops & market are the natural shopping area, there's no need to move the centre, and no need for more shops either large or small.

Developing a transport interchange at the existing railway station is not a solution, and could not have all the necessary services. The Maltings development cannot be viewed in isolation, it has effects on the transport arrangements throughout the City and the region.

Short & medium term money concerns are no way to decide this, which affects a major historic city for all future time. There are deeper heritage issues.

By all means include youth hostel and hotel accommodation along with residential flats above shops, but keep Sainsbury's as is.

Do not move the Library. It's position serves its function. It's function serves its position. It is a free public service, in public ownership. Do not change this. Commercial considerations have no

bearing in these matters. The library will die if moved with reduced footfall, do you want that? The art galleries need to be in the same building of course.

Nationally, container traffic could be largely transferred to rail if there were a transfer depot near each town, so only the last mile is by road. This could be at the disused rail yard behind Salisbury station, likewise at Wilton and Solstice Park Amesbury. "

City Centre needs to be traffic free to meeting government legal requirements for air quality for those who live and work in the City. The Central Area Framework consultation agreed this should be implemented, but it was not given a fair trial.

The People Friendly Streets proposals were very poorly dealt with and were an opportunity missed. The implementation of a sustainable integrated transport plan for Salisbury should be considered by a deliberative democratic group of Salisbury citizens in the form of a Citizens' Jury or Assembly to ensure that the views of a range of stakeholders are considered and that the recommendations have the support of residents.

"Within the city itself reduction in car use can be achieved through design . The concept of a ring road is for the car parks to be accessed from it e.g. Culver Street so as not to have to drive through the city. The entrances to the Central car park should be restricted to enable pay on exit . Pay and display is a disincentive for visitors to stay longer as is the current charging structure and lack of ability to pay by card.

Park and ride should be better promoted . That It is free to bus pass holders may not be widely known.

On street parking within the city centre should be removed during the day. Loading hours should be restricted. This would enable some pavements to be widened.

People who live in the city centre often still need a car owing to Salisbury's main employers lying outside the city, e.g. Hospital, Porton Down . Also to visit relatives or to other towns where public transport links are inadequate .Even city centre employees may need to undertake site visits by car e.g. estate agents. "

"What is Coldharbour Lane contraflow? On this document, it is difficult to see which streets ie streetnames are actually involved. What is ""Quiet street?"". Re cyclists near the allotments of Fisherton Farm, there is already an issue there as several cyclists need to be reminded that pedestrians have rights too. I think the cyclists need to see signs telling them that this is the case. Also I would be inclined to use public transport more if it was reasonably priced and more reliable timewise. We really do need a relief road to remove the current logjam by the Wiltshire College roundabout. It is not solely at peak times.

"

car use must be kept out of the city by creating cycle lanes and not ripping them out at the first sign of upsetting car drivers

To encourage walking, pavements need to be maintained and improved.

Public transport is not an option as it is rarely goes where and when you need to go and is terrifically expensive. It can make sense, as an option, if travelling on your own but a family or group paying multiple fares to the same destination is prohibitively expensive.

Address the empty spaces in our car parks. Low prices for shoppers free blue badge parking and higher all day charges. 3 hours is the optimum time to shop and get a bite to eat.

"There was no way to comment on the Ring Road, I presume this is Wiltshire Council's remit. No suggestions as I can't envisage what is being suggested.

But it does sound as if locals aren't the priority."

NDP response

Agree that Policy 21 will benefit from reference to LCWIP. Changes made.

The NDP cannot easily influence how WC delivers CP3 and therefore it is difficult to demonstrate how the NDP will deliver modal shift.

Highways management and investment is outside the remit of neighbourhood planning.

POLICY 22: CYCLING AND WALKING INFRASTRUCTURE

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 22	<p>Basic Condition on general conformity: the NDP needs to take account of strategic provisions (WCS core policy 61) that already exist in respect of Transport and Development and will be reviewed in the Local Plan. If a local policy such as this is to be retained, clarity is required about how this will complement strategic provisions</p> <p>WC opposes that radial and peripheral routes in Figs 36 and 37 will be prioritised over on-road facilities. Those routes identified in the Salisbury LCWIP as primary routes are the ones that should be prioritised. This includes quiet streets, shared paths, segregated facilities and semi-segregated cycle lanes.</p> <p>Policy implies relation to (Figure 36) LTN 1/20 cycle and walking routes, but also says they are routes for increased planting - in many places this will not be achievable.</p>
NDP response	
<p>Figure 36 – change title to “Walking and cycling connectivity aspirations”</p> <p>Figure 37 – replace with LCWIP</p> <p>Policy 22 - reference made to CP61 and LCWIP made in rewritten policy</p>	

Respondent name
NW resident
Respondent comment
<p>1. Is to prioritise the development of cycle tracks. A lot of our cycle routes in Salisbury suddenly end putting the cyclist back on the road with cars. Having Salisbury seen as a leading city for cycling supports increasing fuel costs, fitness and green agenda for our city environment. Also if successful starts to open new opportunities for tourism eg cycle routes to our main historic sites with associated bike hire etc.</p> <p>2. Safe routes from residential areas to all our schools. We are quite good at this with speed bumps and traffic controlling around most of our schools EXCEPT Wyndham and st marks. We should place speed bumps to slow the traffic (the roads leading in front of the school are regularly used as cut through a eg Devonshire and moberly with traffic travelling too fast in a residential area with children trying to travel to school. This links into safer cycling routes for children to our schools.</p>
NDP response
Agree that more reference to school trips is necessary. Change to Policy 22.

Respondent name
Comment from commonplace website
Respondent comment

Policy 22: Cycling infrastructure - if this is implemented it is important that it is a genuine network, and that thought is given to also connecting the outskirts/nearby villages in order to avoid issues like the current termination of the cycleway on Southampton road which stops abruptly forcing cyclists into the road immediately before the dangerous corner at Petersfinger, and also causing traffic congestion for drivers when cyclists mix with traffic on a relatively narrow section of road. I am also not convinced of the requirement for additional refreshment areas, given the relative distances involved, and the number of new coffee shops in Salisbury itself.

With regards the Churchfields development, it's not clear how it is expected that people from surrounding districts/villages would get there without using cars, as the railway only serves a narrow corridor of places.

And whilst the objective of making the centre car-free is admirable, I have a recollection that shop owners were complaining previously about decreased levels of business when the car park charging went up. So I would be concerned that we might end up with a traffic free city, but with even more empty shops, and people choosing to drive elsewhere (unless more thought is given to making it easier to access the city, rather than assuming that people will suddenly want to use the Park and Ride where the buses always seem to be running empty - which suggests that they can't be either economically viable to operate, or financially attractive to use?)

There also doesn't appear to be any mention of trying to improve the existing road network outside of the city centre (e.g. enhance flow/avoid the frequent gridlock that occurs - as even with the proposed enhanced cycle/path networks, people will still need to use cars to access surrounding villages/nearby towns) and also ensure that the road surfaces are adequately maintained (rather than the current deteriorating state with many potholes/poor mending which makes cycling a risky business)

NDP response

These are all matters that the NDP cannot easily influence because they relate to highways management, provision and engineering.

Respondent name

Responses from commonplace website

Respondent comment

It implies that the council would prefer to develop new routes to enhancing existing ones. Improving safety on key desire routes from residential centres to the city must be a major focus and priority, irrespective of new developments.

Hoverboards, electric scooters, roller blades, mobility scooters, and many other forms of personal transport are appearing. There is not just cycling or walking.

Not happy with prioritising green link routes over on-road facilities. The green routes are lovely and have their place - I use them quite a bit - but a) by definition, they often don't actually pass through or beside the destinations you want to cycle to; b) they may feel less safe than streets, especially for female cyclists, because they are quieter, less frequented and less well lit (and we

don't want to ruin their beauty and environmental quality by putting street lighting along them where it's currently dark); c) as a cyclist and pedestrian I find shared use, which is common if not ubiquitous on green routes, is both unpleasant and inconvenient (it makes cycling far slower, more uncertain and therefore less attractive); and d) for serious modal shift to happen it's really important that road space is taken away from private cars and given to cyclists, pedestrians and public transport.

If this goes through a future phase of policy development might usefully look at specifics eg connectivity from Netherhampton Road to Odstock (Hospital).

"We need a proper transport interchange in Salisbury's central car park (Maltings), with a big 'bus station, like at Bath. If it's not done at The maltings, it could be done at Waitrose's site, but that's further from the attractions, and for the future.

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Short & medium term money concerns are no way to decide this, which affects a major historic city for all future time. There are deeper heritage issues.

By all means include youth hostel and hotel accommodation along with residential flats above shops, but keep Sainsbury's as is.

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Nationally, container traffic could be largely transferred to rail if there were a transfer depot near each town, so only the last mile is by road. This could be at the disused rail yard behind Salisbury station, likewise at Wilton and Solstice Park Amesbury. "

Walking and cycling infrastructure for new developments needs to be in place before occupation not as an add-on after new residents have developed car-dependent habits.

I think this is very important. I can't see any developer achieving the modal shift they are supposed to achieve in the previous item without actually improving the network and building more infrastructure for cycling and walking into the city centre.

Fantastic idea about 30 years too late. Cycle ways are great right up to the point you have to go on a road, then you are in the lap of the gods. Narrow roads, inconsiderate and poorly educated drivers and no policing makes this hazardous

I think cycling is very dangerous with our present Road infrastructure, both for drivers & cyclists. Worse still when cycling takes over footpaths. Especially as the state of both the roads & pavements are poor.

NDP response

Good point about personal transport (not hoverboards which have not yet been invented because this is not Back to the Future). Added a new reference to "for the mobility impaired".

References to green routes being prioritised have been removed.

POLICY 23: CYCLE PARKING

Respondent name	
Wiltshire Council	
Respondent comment	
	are routes for increased planting - in many places this will not be achievable.
Cycling parking / storage	Cycle parking standards were published in July 2022, in Wiltshire Council's Active Travel Infrastructure Standards
NDP response	
Noted that the LCWIP comments on street trees so change to Policy 1 made. The LCWIP is silent on cycle parking standards. Nothing could be found online for "WC Active Travel Infrastructure Standards" so it was not possible to take account of them.	

Respondent name
Responses from commonplace website
Respondent comment
<p>There are many more forms of personal transport besides cycles.</p> <p>This might also apply to greenfield sites/and out of the city centre.</p> <p>I'm not sure parking is the problem. Having lived in the Netherlands, the issue is more the safety of the roads than availability of parking.</p> <p>-</p> <p>Great idea but requires SECURITY otherwise people will not use it. A cheap bike now is £500 plus and bike thieves seem to be immune as bike theft is not a priority to the police.</p> <p>I haven't. We aren't a big city. It will look awful & will be easily damaged, graffiti will appear etc</p>
NDP response
Noted.

POLICY 24: CYCLING FOR PLEASURE

Respondent name	
Wiltshire Council	
Respondent comment	
Para 328	This can be strengthened by stating that all major developments must deliver Travel Plans in accordance with Wiltshire Council's Travel Plan guidance, and this includes purchasing and distributing the relevant walking and cycling maps as set out in that guidance which may include The Salisbury Walking Map, Salisbury Cycling Map, Salisbury Bus Walks Map, Salisbury to Stonehenge bus and cycle map, and the Salisbury to New Forest Map.
NDP response	
Changes made to wording of policy 24.	

Respondent name
Responses from commonplace website
Respondent comment
<p>Safer crossing points are just as vital for non-leisure cycling. The obstacle course every cyclist has to run just to cross the ring road almost anywhere in the city is scandalous: steep hairpin ramps, blind right-angle corners, random bollards in the way, dazzling floodlights in your eyes, stagnant puddles after heavy rain, low bridges that could take your head off, dead-end cycle paths that either bring you to a row of railings or eject you onto a busy road. The list is long and depressing.</p> <p>Pie in the sky thinking again. Until it is safe to cycle in this city, amenities are a waste of time as you won't have the number of cyclists to use them.</p> <p>My safety concerns would need to be addressed. Just for reference my son is a cyclist, and my grandchildren cycle</p>
NDP response
Noted. Most of these matters are for WC to address. Some matters will be improved through the LCWIP.

POLICY 25: RESIDENTIAL PARKING

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 25	Basic Condition on general conformity: the NDP needs to take account of strategic provisions (WCS core policy 64) that already exist in respect of Demand Management and will be reviewed in the Local Plan.
NDP response	
Modified wording is made for policy 25.	

Respondent name
Responses from commonplace website
Respondent comment
<p>I'm not convinced this changes the problem in the short to medium term. Allowing residential development without parking in the city centre is a good goal but in practice simply lifts the number of vehicles with or without resident permits looking for parking.</p> <p>'Planning applications for residential developments without allocated parking spaces within Salisbury, particularly in the central area, will be supported' - we agree with this statement only as long as such developments are not given any on-street parking permits as there is already insufficient parking for city centre residents.</p> <p>"Delete the first part. Even if the resident does not need a car. - and many will as there is a lack of employment opportunities within the city itself , they are likely to have visitors. Such a policy leads to inappropriate parking which causes obstruction and damages the structure of the pavements. "</p> <p>I would like to see residential parking removed from on-street wherever possible. This is often on the narrow streets of the Chequers where pavement width is inadequate for pedestrians, especially wheelchair users and the streets too narrow for safe cycling.</p> <p>Planning applications for residential developments without allocated parking spaces within Salisbury, particularly in the central area, will NOT be supported</p> <p>Strongly support car-free (and car club) housing and employment development. But baffled by emphasis on on-plot parking. Surely if precious space is to be devoted to car parking it should always be on-street? This is far more efficient use of space, regulated by use of residents' parking permits and other measures where necessary. It's also likely to lead to better urban design that trying to include parking on plot.</p> <p>I am not sure what type of person will be living in a place where there aren't any spaces for parking. What about visitors? Dropping off parcels? So are these accommodations aimed at?? Bearing in mind the decreasing numbers of younger people taking up driving for whatever reason this would support their potential priorities for developers costs/priorities to sit elsewhere!</p>

I don't understand. You'll support developments without parking but new developments should have parking and not rely on street parking? I'm confused. The fact is, most people want parking, which is why Salisbury is expanding into former green spaces. Even if you live in town, you probably want to leave from time to time, so will have a car. We're not London. We need more parking options. Build up, not out.

How about pushing the parking for vehicles from these developments further away from front doors? For example, repurpose a floor of Culver St car park as residents parking for those who have a car or need occasional use but have nowhere else to park it. Ultimately we want the number of vehicles to decrease and the number of commercial buildings repurposed as residential to increase but without structural and central investment in coherent active travel solutions, we're just playing one policy objective off against another because new owners/tenants won't be attracted on the basis of active travel which doesn't exist!
Residents parking permits within the ring road should be 24hr.

I would suggest using part of Brown Street, Salt Lane and Culver Street Car Parks for off-road residential parking. This could be in designated areas with CCTV and electric charging points. This would give residents secure parking and enable them to switch to electric cars if they wish which is not practicable when parking on-street. It would not prevent the remainder of Brown Street and Salt Lane car parks being re-developed for housing, commercial uses and greenspace.

" I would like to see residential parking provided off-street wherever possible such as allocated areas of the ground floor of Culver Street car park and a dedicated section of Brown Street and Salt Lane car parks retained for this purpose. These areas would have CCTV and electric charging points. Removal of on-street parking would improve the street scene, allow pavements to be widened for motorised mobility scooters and the provision of safe cycling. It would also provide secure parking for residents.

I would also support more car-free developments in the city centre and reduced minimum parking standards for new developments."

Use of upper floor of Culver Street car park for residents only together with designated bays for charging of electric vehicles

As a city centre resident, past planning decisions on out of town shopping means that having a car is essential in order to buy bulky items that cannot be transported on public transport or things that can't be physically carried. Visiting relatives and friends who are not served by public transport would also be impossible. A car parking space is therefore essential. We only have one small car used for these purposes and use it only when strictly necessary, walking whenever possible, but I think that most households have these needs from time to time and to deprive residents from owning a vehicle is Draconian.

I think the policy could be more positive about car-free developments or part developments and the pleasure of living somewhere where the outside space is there for everyone to enjoy, replacing tarmac with more greenery and play spaces, improving air quality etc. As someone who

doesn't own a car I would love to live in a car-free area in Salisbury. Limited parking spaces e.g. for visitors and/or community cars could be provided on the outside of the development.

Ridiculous..... Short sighted money grabbing foolishness by the council. We need better, affordable public transport before this is a practical suggestion. In the mean time these developments just mean more on street parking battles. Who is thinking up this stuff???

NDP response

Understood that most people want parking, but the NDP overall is seeking to reduce congestion in the city centre so if some developments do not provide parking, because it is what that development requires, the NDP will support that.

Other matters are not the remit of neighbourhood planning.

CHAPTER 7: WORKING INTRODUCTION

No comments received

POLICY 26: WORKING FROM HOME AND LIVE-WORK UNITS

Respondent name
Responses from commonplace website
Respondent comment
<p>I'm not sure this is required now. People either work at home or their work provides them a space to work outside the office. That said, the library should have a facility for people to access good WiFi and work comfortably, which it doesn't.</p> <p>Greater efforts should be made to attract highly paid jobs to the City. Most of the vacancies are for minimum wage jobs.</p> <p>Making provision for about 1% of the working population.... Really??</p> <p>I have put off joining in this consultation because I don't know enough. My instinct says that Community work hubs are a good idea, not sure about home schooling. In fact I'm not keen in it as I believe most children benefit from the social aspects of school. Is it all going to be residential?</p>
NDP response
Policy 26 seeks to have design that supports home working. Remove reference to home schooling because this is not something that the NDP can affect.

POLICY 27: VISITOR ACCOMMODATION

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 27	Basic Condition on general conformity: the NDP needs to take account of strategic provisions (WCS core policies 39 and 40) that already exist in respect of visitor accommodation and will be reviewed in the Local Plan. If a local policy such as this is to be retained, clarity is required about how this will complement strategic provisions.
NDP response	
Comment on policy 27 – will add reference to CP40.	

POLICY 28: POST OFFICES

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 28	It is unclear whether this policy can have effect in decision-making on planning.
NDP response	
Comment us unhelpful as worded. What does it mean and why is the policy not effective in decision-making? Policy change to make more specific reference to Use Class Order	

Respondent name	
Responses from commonplace website	
Respondent comment	
<p>Yes, this is very important. The post office does many useful things besides dealing with mail. The ones in town are totally inconvenient and I don't miss them at all. I like the small neighbourhood ones, like bishopdown and bemerton.</p> <p>Too late again.... Main Post Office has gone.....never to return. Oh Dear</p> <p>It would be nice to have a proper 'Central Post Office' within the City Centre!</p>	
NDP response	
Noted.	

POLICY 29: MAJOR FOOD RETAIL

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 29	Basic Condition on general conformity: the NDP needs to take account of strategic provisions (WCS core policy 38) that already exist in respect of retail and leisure and will be reviewed in the Local Plan. If a local policy such as this is to be retained, clarity is required about how it will complement strategic provisions.
NDP response	
Core Policy 38 does not mention Salisbury retail provision and speaks only about existing town centres. This policy is about the relationship of out of centre major retail and the creation of extra transport impacts which is different. However, will add a reference to CP 38.	

Respondent name	
National Highways	
Respondent comment	
Section 7 Working - Policy 29 Food Retail: we note that major food retail will generally only be supported in areas where there is less existing provision. Whilst we would not disagree with that approach, it is noted that on this basis development to the west of Salisbury could be considered a preferred location. Whilst this could reduce longer journeys on the A36, any emerging proposals in this area may have the potential to create local impacts on the A36 Wilton Road and its associated junctions, and will therefore need to be supported by a detailed transport assessment with the provision of any necessary mitigation in line with the requirements of the NPPF and DfT Circular 02/2013.	
NDP response	
Assume that ALL major retail will require a detailed transport assessment.	

Respondent name	
Response from Asda Stores Ltd from commonplace website	
Respondent comment	
<p>"It is important to recognise that there is a conflict between the consultation question of "We want to even up the distribution of supermarkets across the city, so we will support large supermarkets where there is currently poor provision" and the proposed policy wording. The former takes a positive approach to proposals in such locations, whilst the policy wording takes the opposite restrictive approach to proposals elsewhere. A policy which instead states "We will support large supermarkets where there is currently poor provision" would be supported on this basis.</p> <p>It should also be recognised that sites for "major food retailing" may not exist in such locations, nor the surrounding transport infrastructure to support such proposals, particularly where they</p>	

might draw custom from a wider area beyond that with a “deficiency” in provision, which may further restrict the ability to deliver larger stores in such locations.

"

Creating smaller units for local food sellers rather than corporate monopolies which take money out of the city is preferable.

For which you will need a car to get to but will be unable to park said car anywhere under many of the other ideas here....

"

Notwithstanding the above, the policy does not take into account smaller scale convenience goods provision. Those areas that are “deficient” may also be equally well served by the provision of new smaller scale convenience stores, or may already be well served by smaller stores. As such, it is recommended that the policy be widened to cover all convenience goods retailing (whether large or small scale) and the policy reworded entirely to set out that:

“Proposals to provide additional convenience goods retailing will be supported in those areas where there is currently poor provision”

Representations submitted on behalf of Asda Stores Ltd"

NDP response

Accept that the policy is slightly negative and will reword to be more positive and refer to local convenience shops.

CHAPTER 8: SITE ALLOCATIONS INTRODUCTION

Respondent name
National Highways
Respondent comment
Section 8 Site Allocations: it is noted that the neighbourhood plan is looking to allocate a number of sites to support the provision of affordable housing. We understand that Salisbury’s residual housing target for the period to 2036 is only 410 dwellings, but note that past trends suggest that windfall sites alone may not address the needs of younger and older people who require affordable housing. Therefore site allocations are proposed to deliver required affordable housing. Whilst we consider that sites at Coldharbour Lane Gasworks (Policy 31) and Brown Street Car Park (Policy 32) are less likely to result in a significant adverse impact on the SRN given their more central locations and better connections to sustainable transport, services and facilities, we continue to have concerns with regards to development at Quidhampton Quarry. These concerns have been set out in previous responses to Local Plan consultations.
NDP response
National Highways concerns have been noted and will be discussed in greater detail in the Basic Conditions Statement.

POLICY 30: QUIDHAMPTON QUARRY

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 30 Quidhampton Quarry	As outlined in previous communications, the NDP needs to take account of strategic provisions (WCS core policy 20) that already exist in respect of the Quidhampton Quarry site, which will be reviewed in the Wiltshire Local Plan.
	The Council has explained this in letters to Salisbury City Council, the last of which concerning the Quarry was dated 22/11/21, and objects to the draft NDP provisions.
Para 380	The incorporation in the draft NDP of an email communication by the Council is deemed to be unhelpful as supporting text to a given policy. This can be referenced and form part of the consultation report.
Para 385	Remove specific reference to team within Wiltshire Council
NDP response	
Comments on para 380: Quote has been replaced with a summary statement. Comments on Policy 30: The steering group notes the LPA's concerns but disagrees. This will be discussed in the Basic Conditions statement.	

Respondent name
Terence O Rourke on behalf of Quidhampton Quarry
Respondent comment
We write to register our full support for the Reg 14 Neighbourhood Plan and can hereby confirm the availability and deliverability of the Quidhampton Quarry Site. We fully support the policy.
NDP response
Noted.

Respondent name
Wessex Area Team, Natural England.
Respondent comment
Policy 30 Quidhampton Quarry We advise that the correct baseline to use for assessing impact on biodiversity and Biodiversity Net Gain is the biodiversity value of the site that would have resulted from successful restoration as per the approved restoration plan, <u>not</u> the current biodiversity value of the site. Non-vehicular connections between this site and nearby housing developments should be sought.
NDP response
Comments on policy 30 – the net gain from the baseline of the approved restoration plan is noted in the policy. Changes made to clauses a and f.

Respondent name
Wessex Water
Respondent comment
<p>Policy 30 Quidhampton Quarry</p> <p>Please see below our comments provided to Wiltshire Council on this site as part of a wider site consultation exercise.</p> <p>Catchment Comments Foul Drainage: Improvement works to be installed to support Fugglestone Road development has been stressed tested and will support additional dwellings at Imerys.</p> <p>Catchment Comments Water Supply: Significant development in this area is not preferred due to the impact on water resources and future EA Licensing requirements</p> <p>An email was sent by the City Council to Wessex Water (see report to Steering Group January 2023). The following response was received on 24/2/23:</p> <p><i>When considering sustainable drainage some components may not be appropriate for contaminated sites, such as those using infiltration, which may re-mobilise pollutants in the ground. However, components that store or convey water on the surface are likely to be more suitable. The CiRIA SuDs Manual will provide further guidance. The SuDS Approving Body (SAB) is likely to have been formed (through implementation of Schedule 3 of the Floods and Water Management Act) by the time the site is ready to proceed. There is likely to be further guidance published or signposted by the SAB on what is likely to be acceptable.</i></p> <p><i>We provided comments to Wiltshire Council to assess the pros and cons of development between towns during Local Plan Review preparation. The Wessex Water Area has recently been defined by the Environment Agency as a “Water Stressed Area”. Our comments to Wiltshire Council were to identify that we are expecting abstraction licenses to be reduced in the Salisbury Area. Significant development in the Salisbury area is likely to trigger the need for new mains and service reservoirs to transport potable water from elsewhere within our network to satisfy demand. I hope that this provides some background to our comments. The comment was not intended as an objection to the proposed allocations in the Neighbourhood Plan.</i></p>
NDP response
<p>The LPA has indicated that 410 dwellings are required on brownfield sites in Salisbury. This will go towards meeting that need. It has been assumed that when making that requirement, water</p>

resources have been checked and found to be suitable. This matter can be addressed in more detail in the planning application stage.

Respondent name

National Highways

Respondent comment

Policy 30 Quidhampton Quarry: we understand the Quarry was previously allocated for employment uses under Core Strategy Policy 20, but that employment development may no longer be economically viable on the site. The neighbourhood plan is therefore looking to allocate the site for up to 400 dwellings, but acknowledges that the current site access onto the A36 via the Penning Road junction is unsuitable for any significant increase in traffic above historic levels. We support this view and, in its current form, National Highways would not consider the access to be safe or suitable to support a development of this scale. Any proposals which have the potential to intensify use of the junction are therefore unlikely to be acceptable to us without mitigation. Whilst we are not aware of any approach to National Highways, it is noted that the site promoter has engaged with Wiltshire Council as the local highway authority to explore options for providing access to the site via the local road network. This would obviously be our preferred approach. We note that under point (f) of Policy 30, any proposals coming forward will need to be supported by a robust transport assessment to include sustainable travel measures, safe and suitable access arrangements, and any necessary highway infrastructure proposals to mitigate impacts on the operation of the highway network. Consideration will also need to be given to the treatment of the existing Penning Road junction with the A36, and it is likely that we would also need to understand the impact of additional vehicle trips through the Pembroke Road/A36 Wilton Road junction, which would provide the onward connection to the SRN if access is achieved via the local road network.

NDP response

Noted.

Respondent name

Responses from commonplace website

Respondent comment

An impact assessment will be required regarding the increase of traffic exiting and entering Pembroke Road to gain access to the housing development.

"Unhappy with the proposed site allocations.

Allocating the Quarry for housing increases it's land value and removes any hope of relocating Churchfields HGV users to facilitate mixed use development. . The quarry site would be an ideal employment site and Salisbury lacks employment opportunities within the city.

"(g) Individual buildings may be up to six stories in height and will be carbon neutral. Priority will be given to designs which are durable, use well-tested design principles, and would be adaptable to future changes in climate or living patterns.

At the moment this is a recipe for buildings which will look dated in thirty years, have too many glass sheets at odd angles, and won't adapt well to changes in living patterns. Victorian terraces or brick mansion blocks are hardly 'imaginative' but they make much better places to actually live in than the sort of architectural trendiness apparently aimed at here. They also last well and are easy to reconfigure when lifestyles change, both of which are good for the environment in the long run.

"

Salisbury traffic system would not cope

"Proposals regarding traffic access to new housing on the quarry via Stanley Little Road need reconsideration. The following factors need to be looked at:

1. Increase in traffic for 300 to 400 homes will add to congestion and pollution in a built up area where many young children and elderly walk.
2. It's already difficult to turn right onto Wilton Road with high volume traffic.
3. Road very narrow with parked cars on pavements making it difficult for lorries, bin lorry, emergency vehicles etc.
4. How would a bus get down this road to service the new housing estate?
5. There is an entrance off the A36 that was used before as access to the quarry, this may be better than increasing traffic in residential area.
6. Consider access road being created from the Avenue.
7. Where will these new residents shop? They will add to congestion as they will have to shop at Waitrose or Tesco's etc, adding more traffic.
8. Dangerous roads. Stanley Little Rd meets Western Way on blind bend, often parked cars, especially on football match days. Already have to reverse and give way on the slope. More cars, more issues, potential for more accidents. Many children cross here to cut across the field on their walk through to school at Sarum Academy.
9. Other accidents off Western Way meeting Pembroke Road, vehicles have gone up onto paths and into gardens on several occasions. Need traffic calming here, worse with even more vehicles."

Needs to be reference to the investigation of other options - e.g. rail or light rail, see below.

Six stories would only be allowed if compatible with the forty foot rule.

"An impact assessment will be required regarding the increase of traffic exiting and entering Pembroke Road to gain access to the housing development. The initial entry and exit is mentioned but not the impact and potential of more than 300 car movements every day. There is a small roundabout at the bottom of Pembroke Road and Roman Road and a junction onto Wilton Road which creates a traffic jam at busy times already. As all the traffic will be funneled onto the Wilton Road A36, it makes far more sense for National Highways to agree an exit onto the A36 where the original quarry vehicles entered and exited. This may cost more however the air pollution and noise pollution would be reduced for the residents of Pembroke Road and the surrounding areas.

The traffic should be monitored now to ascertain the usage of Pembroke Road for a minimum of one week to one month over the 24-hour day. The air quality could also be measured as well as

the noise levels to ascertain whether the additional car journeys from the proposed estate would bring this to unacceptable levels for a residential road. "

"Sites near existing park and ride locations, the problem is these nearly all lie outside the city boundary .

A more proactive policy toward reuse of vacant upper floors within the city."

"I see that the Churchfields Master Plan indicates that the Household Recycling Centre and other Council owned buildings will be removed and replaced by housing. I think this is a good idea but I can't find anywhere in the NP where there are any suggestions as to where this facility will be moved to. it is more than likely to be to a greenfield site outside the city adding industrial sprawl into the countryside.

For many years the Quidhampton Quarry has been considered as a possible site for recycling and waste storage. It is well hidden and large enough to provide a full turning circle for vehicles without queuing on the approach road. It has also been suggested in the past that because the quarry is close to the railway and had it's own branch line that it could be possible to transfer waste by rail rather than road in future. I know there are concerns from Highways England about access off the A 36 but this could be overcome. This is a visionary approach but we need to get freight onto rail and with increasing population there will be more and more waste and recycling to be transferred around the country. If this site is used for housing this will remove any possibility of its use for this purpose. The NP needs to be visionary so that sites are safeguarded for future need. Please can this idea be seriously considered."

-

(h) is a very good stipulation but you might want to put minimum dimensions (2m x 2m?), because it's the sort of thing builders will cheat or cut corners on. The architect Christopher Alexander studied how people use balconies and terraces, and concluded that unless they were at least 6ft deep they weren't actually used.

"Proposals regarding traffic access to new housing on the quarry via Stanley Little Road need reconsideration. The following factors need to be looked at:

1. Increase in traffic for 300 to 400 homes will add to congestion and pollution in a built up area where many young children and elderly walk.
2. It's already difficult to turn right onto Wilton Road with high volume traffic.
3. Road very narrow with parked cars on pavements making it difficult for lorries, bin lorry, emergency vehicles etc.
4. How would a bus get down this road to service the new housing estate
5. There is an entrance off the A36 that was used before as access to the quarry, this may be better than increasing traffic in residential area.
6. Consider access road being created from the Avenue
7. Where will these new residents shop? They will add to congestion as they will have to shop at Waitrose or Tesco's etc, adding more traffic.
8. Dangerous roads. Stanley Little Rd meets Western Way on blind bend, often parked cars, especially on football match days. Already have to reverse and give way on the slope. More cars, more issues, potential for more accidents. Many children cross here to cut across the field on their walk through to school at Sarum Academy.

9. Other accidents off westernway meeting pembroke road, vehicles have gone up onto paths and into gardens on several occasions. Need traffic calming here, worse with even more vehicles."

Transport is the key issue at the Quidhampton Quarry site. It would make sense to develop the site as largely car free (except for deliveries/disabled) and to provide e.g. a driverless shuttle (along the lines of the Dockland Light Railway) along the existing railway lines to Salisbury station (& maybe beyond).

I looked at this in detail and thought it was well thought through, except for the high rise element -6 stories is too high. I think people are happier in low rise flats if you want a community spirit.

NDP response

This site would not be a replacement for Churchfields because of poor road access, particularly for HGVs. Any proposal on this site will be required to have a full transport assessment.

POLICY 31: COLDHARBOUR LANE

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 31 Coldharbour Lane	<p>The Coldharbour Lane 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'.</p> <p>From flood mapping it appears that the entirety of the site is situated within Flood Zone 2 and parts of it 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.</p> <p>The policy is missing a few areas such as design, number of units, ecology, connections, transport movements, community infrastructure, especially given this is a sheltered scheme, a view on height / landscape given the level of buildings around it and the height of the gasometer historically, protection of River Avon SAC during construction.</p> <p>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.</p> <p>It is essential that the site provide at least one electric car club vehicle and that it does not create additional parking demand on highway.</p>
NDP response	
A sequential test is being undertaken as part of the NDO. The NDO will provide the details regarding design, flooding, ecology, safeguarding, etc.	

Respondent name
Wessex Area Team, Natural England.
Respondent comment
<p>Policy 31: Coldharbour Lane</p> <p>393. NE supports the proposal to create a riverside pocket park – and in addition, as highlighted at 199, development/redevelopment should aim to integrate the protection and restoration of the natural river habitat and riparian zone. We recommend that the 'beautifully landscaped gardens' could also face the stream.</p>
NDP response
Noted

Respondent name
Environment Agency

Respondent comment
<p>Coldharbour Lane</p> <p>We note that the old gasworks on Coldharbour Lane is earmarked for allocation in the Plan. The site was correctly identified as at risk of flooding (flood zones 2 and 3) within the Strategic Environmental Assessment (SEA) for the Plan. (Although the flood outlines on the insert of the flood map for the site are incorrect). It is proposed to develop a sheltered housing complex on the site, which would be considered as ‘more vulnerable’ within the National Planning Policy Framework. This means the proposals would need to be accompanied by a Sequential Test (ST) for the local planning authority (LPA) to decide whether the proposals are appropriate in this location. We would encourage the Steering Group to explore this process and the likelihood of the ST being passed by the LPA. If it is likely that the LPA passes the ST for the development, any planning application would then need to pass the Exception Test via a Flood Risk Assessment (FRA) in consultation with the Environment Agency. There is no guarantee that either test would be passed, therefore early engagement with the LP in the first instance is important. It is possible that the LPA decide the ST would not be passed, in which case it may make the proposed allocation unsound. Please see the following link for further information - Flood risk and coastal change - GOV.UK (www.gov.uk)</p>
NDP response
A ST is in preparation. The FRA will then follow if necessary.

Respondent name
Wessex Water
Respondent comment
<p>Policy 31 Coldharbour Lane</p> <p>Please see below our comments provided to Wiltshire Council on this site as part of a wider site consultation exercise.</p> <p>Water Supply Comments: Significant development in this area is not preferred due to the impact on water resources and future EA Licensing requirements.</p>
NDP response

Respondent name
Firstplan for National Grid as landowner
Respondent comment



Our Ref: 19002/SH/ik
Email: sharper@firstplan.co.uk
Date: 30 September 2022

FIRSTPLAN

Broadwall House, 21 Broadwall, London
SE1 9PL

T: 020 3096 7000 W: www.firstplan.co.uk

Mr Yaroslav Pustarnakov
Corporate Services Officer
Salisbury City Council
The Guildhall
Market Place
Salisbury SP1 1JH

By email only

Dear Mr Pustarnakov,

**SALISBURY NEIGHBOURHOOD DEVELOPMENT PLAN – REGULATION 14 CONSULTATION
REPRESENTATION ON BEHALF OF NATIONAL GRID PROPERTY
FORMER GASWORKS SITE, COLDHARBOUR LANE, SALISBURY, SP2 7PD**

We are instructed by our client, National Grid Property (NGP), to submit the enclosed representation to the Salisbury Neighbourhood Development Plan (SNDP) Regulation 14 Consultation, specifically in relation to the draft allocation of the former gasworks site, Coldharbour Lane, Salisbury.

Background Information

National Grid is a gas transporter that owns much of the network of gas mains and infrastructure across the United Kingdom. Their gasholder fleet is no longer operational, as gas can be stored in pipework underground. This means that many sites, comprising gasholder stations and gasworks facilities, are no longer in use. Instead, they provide an opportunity for alternative development, this being the case with the former gasworks site in Salisbury.

Site Description

The submission site represents previously developed land located northwest of the town centre, it is approximately 2.12 acres in size. The site predominantly comprises open areas of hardstanding and gravel following a decommissioning programme which saw the removal of a redundant gas holder and a number of vacant buildings (as permitted under prior approval applications ref: 15/11751/DEM, 17/01078/DEM and 19/02551/DEM).

Representation

The site was initially submitted via the SNDP 'Call for Sites' exercise in July 2020, where NGP highlighted that whilst the site has many attributes which make it ideal for redevelopment, it also has significant costs associated with its preparation for alternative redevelopment purposes. NGP also confirmed that the site was likely to be transferred to a development partner following the requisite remediation and preparation for redevelopment. In this regard, it is important to confirm that a Joint Venture Partnership (JVP) between

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National Grid and Places for People (forming 'National Places') is firmly in place and that the JVP are pursuing a residential-led redevelopment scheme that will deliver policy compliant affordable housing to meet local needs. This has been made clear to the NDP Steering Group on multiple occasions.

NGP are therefore disappointed to see that the site is subject to a draft allocation under 'Policy 31 – Coldharbour Lane' for a 60-unit sheltered 100% affordable housing scheme with associated communal space. It is further understood that a Neighbourhood Development Order, sponsored by the City Council, is being progressed for the site.

NGP have tried to remain in close contact with the Steering Group regarding their proposals for the site, but only found out about their recent pre-application submission after it had been submitted to Wiltshire Council for consideration. Whilst NGP are grateful to have been kept informed of progress since this point, it is regrettable that the site continues to be promoted for the use specified in the draft allocation when NGP have been clear regarding their own intentions for the development of the site, as well as the viability challenges that burden it. This, therefore, means that the draft allocation is extremely unlikely to proceed.

With the existence of an active JVP between NGP and a residential developer, of which this site falls into the agreed portfolio, NGP must now submit their formal **objection** to the draft allocation for the site.

NGP have been clear with all parties throughout discussions, which have spanned the past couple of years, that the JVP is currently in the advanced stages of producing a scheme for the site, which will be submitted for pre-application advice from the local planning authority imminently. National Places' aspirations for the site are focussed on delivery of a market housing-led residential development scheme, to deliver affordable housing at a policy compliant level. The JVP is confident that it can design and deliver a viable scheme that will deliver public and private benefits and secure the optimum development potential of the site, despite its well-documented constraints.

There are matters surrounding flood risk and ecological impact to be resolved, together with site remediation works, which shoulder significant financial burdens and will ultimately impact on viability and affordable housing delivery, in turn. The impact of site remediation and the associated abnormal costs must, therefore, form a material consideration when further details are discussed in relation to the proposed development and, specifically, its viability. For now, though, it is the intention to deliver a residential scheme that is policy compliant in regard to affordable housing provision.

With the above in mind, National Places must continue to promote the site for their preferred development proposals. The JVP therefore request that the SNDP Steering Group reconsider the availability, suitability and deliverability of the site for the draft allocation noting that this is extremely unlikely to materialise.

Government guidance around the process by which NDP policy should be crystalised is clear:

Other public bodies, landowners and the development industry should, as necessary and appropriate be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying bodies will be better placed to produce plans that provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development. [Planning Practice Guidance]

As such, if the NDP is to possess a deliverable and realistic allocation, the direction needs to change to reflect a market-led housing scheme with a policy compliant provision of affordable unit, which the site is available and indeed intended for. There is room for discussion around the format of the residential provision, and indeed the affordable units – and again we invite discussions in this regard - but as currently worded the

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allocation is unrealistic. It is not in the interest of the local community to continue to pursue what is only an aspiration, rather than a realistic allocation for alternative development.

I trust that this information is sufficient clarify National Places' position in relation to the draft allocation currently being promoted through the Draft Neighbourhood Plan. However, should you wish to discuss any of the points above in further detail, please do not hesitate to contact me.

Yours sincerely,



SAM HARPER
Director

cc. Adrian Cross - National Grid
Edward McDermott – Places for People

NDP response

Respondent name

National Grid

Respondent comment



Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

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avisonyoung.co.uk



Our Ref: MV/ 15B901605

30 September 2022

Salisbury City Council
planning@salisburycitycouncil.gov.uk
via email only

Dear Sir / Madam
**Salisbury Neighbourhood Plan Regulation 14 Consultation
July-September 2022
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Avison Young (UK) Limited registered in England and Wales number 6382509.
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS



Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Matt Verlander".

Matt Verlander MRTPI
Director
0191 269 0094
matt.verlander@avisonyoung.com
For and on behalf of Avison Young



National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

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Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS

3

NDP response

Respondent name
Comment from commonplace website
Respondent comment
What is happening to the old gasometer site? It is a prime brownfield location ripe for development. When it is developed please sort out the road access to George street and especially please adopt marsh lane (which is a blight on the neighbourhood)
NDP response

Respondent name
Responses from commonplace website
Respondent comment
<p>"Unhappy with proposed allocation. The site lies within an area of flood risk and is likely to have a high water table and will be contaminated from its past uses and expensive to remediate. There is a surplus of sheltered housing in Salisbury.</p> <p>-</p> <p>"As long as it's possible to keep the accommodation genuinely affordable, what about the right to buy? Will that mean flats simply get sold off? Also Salisbury has an oversupply of accommodation for the elderly, as noted in other policy documents."</p> <p>There already is a bridge across the river and perhaps this could be compulsorily purchased to provide access to the site (if necessary).</p> <p>What other suggestions do you have? - {62b1d2d315c6d0001352025b} - Site Allocations</p> <p>For affordable sheltered housing why not look at reconfiguring some of the elderly persons housing within existing estates such as W Harnham and Bishopdown where there is potential for additional units.</p> <p>When you say parking is provided- do you really mean that you will give them a parking permits for the near by roads. This of course would be a disaster</p> <p>Car parking for residents should be reduced/restricted - in this highly accessible location they should be encouraged to use other modes of travel (and there already is a Co-Cars car share vehicle in York Road, perhaps another could be paid for by the developer to be located on this site?)</p> <p>A question- how long does it take to decontaminate such a site? It seems like such a good idea though</p>
NDP response
Noted.

POLICY 32: BROWN STREET CAR PARK

Respondent name	
Wiltshire Council	
Respondent comment	
Policy 32 Brown Street car park	<p>Paragraph 5.117 of the Wiltshire Core Strategy identifies Brown Street car park 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'.</p> <p>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) <i>subject to</i> car parking studies being undertaken due to its operational use as a car park. WC has provided the Qualifying Body advice on what a car-parking study might involve. NDP provisions in respect of Brown Street car park can be formulated, but are conditional on a long-term parking strategy for Salisbury. Such a strategy will form part of the forthcoming Local Transport Plan, currently due for completion by March 2024.</p> <p>In the pre-Regulation 14 version of the NDP the site was allocated for up to 15 dwellings. The Regulation 14 version of the NDP allocates the site for up to 50 dwellings. The HRA has assessed the site based on up to 50 dwellings however it is highlighted here in case it is an error in the Regulation 14 version of the NDP.</p>
	<p>Otherwise, this policy is highly prescriptive and proposes details (especially the balconies) that are uncharacteristic of Salisbury; the walking route through the car park would need to be maintained and improved.</p>
NDP response	
It was the intention to allocate the site for up to 50 dwellings. It is accepted that the site might not become available if it retained for parking. Design details will be addressed in the NDO.	

Respondent name	
Wessex Area Team, Natural England.	
Respondent comment	
Policy 32 Brown Street car park	
We note that this site is likely to have very low biodiversity value. As such a 10% BNG is likely to yield very little. We advise that this requirement is dropped from the policy, particularly as it is covered in policy 10. Instead, it may be more productive to specify site specific requirements as tightly as reasonable in the policy.	
NDP response	
No, the BNG requirement should not be dropped – it can be delivered off site.	

Respondent name	
Wessex Water	
Respondent comment	

Brown Street Car Park, Salisbury

WATER MAINS

- Distribution Main
- Washout Main
- Raw Water Main
- Abandoned Main
- Private Main

SEWERS

- PUBLIC
- PRIVATE
- SECTION 104
- OTHER WESSEX PIPES
- NON-WESSEX / UNKNOWN

STRUCTURES

- Manhole - Foul
- Manhole - Surface
- Manhole - Combined
- Outfall
- Inlet
- Langhole
- Bifurcation - Foul
- Bifurcation - Surface
- Bifurcation - Combined
- Combined Sewage Overflow
- ▲ Pumping Stn - Surface
- ▲ Pumping Stn - Foul/Combined
- ▲ Vent Column
- ▲ Rodding Eye
- ▲ Catchpit
- ▲ Flushing Chamber
- ▲ Soakaway
- ▲ Non Return Valve
- ▲ Washout
- ▲ Air Valve
- ▲ Hatch Box

OTHER STRUCTURES

- Attenuation Tank
- Storage Tank
- Chamber
- Tunnel
- Interceptor

DATE: 07/09/2022, 13:07:56
SCALE: 1:1,250
CENTRE: 414,614, 129,844

Policy 32 Brown Street Car Park

Please see attached Wessex Water asset plan for the Brown Street Car Park. An initial check of our assets show underground infrastructure surrounding the site but none directly crossing the car park.

NDP response

This will be noted in the NDO.

Respondent name

Responses from commonplace website

Respondent comment

Only the car park on the eastern side of Brown Street should be redeveloped. The western car park is close to shops and the cinema and is beneficial to the city's economy.

Unless this policy is removed entirely I will be voting against the whole plan. Brown St car park is permanently busy because it's so well-located (any study that purports to say otherwise was clearly conducted at 2am!), and there's no good reason for removing it as a public amenity.

It's a good scheme - although situated between two busy roads does very little to contribute towards healthy living. I wouldn't recommend a flat with a balcony for that reason. In fact I don't think it's really suitable for flats at all.

The preservation and modernisation of NHS services in the City Centre should be a priority in any development. It is good to see that this is part of the vision and it will be very interesting to see how this develops as the plan moves forwards.

I'm concerned about the loss of car parking. Although it would be lovely to have a car free or fewer cars in the city centre Salisbury is in a very rural setting and despite aspirations, public transport isn't good. Even the railway service is poor due to government investment in roads at the expense of railways.

I disagree with the whole proposal

Brown Street should remain a car park. It is essential to the businesses that are within walking distance of the car park. Reducing the car park will result in more empty premises. The car park should be enhanced to include two coach parking bays. Free wi-fi should be provided across the area.

I'm doubtful about losing parking close to shops and businesses. It would be lovely to have fewer cars in the centre but is it realistic in view of inadequate public transport in such a rural area?

This consultation is unsound because this online survey is far too complicated for the average resident to access. It simply gives planners carte blanche to override local opinion.

In an ideal world something similar needs to be done for the Maltings/Central Car park which other than the Riverside Park seems to be settling in for another decade or two letting down the city and its residents AND visitors.

Brown Street car park is one of the only decent car parks. Culver Street is far and dangerous for people with children and women. No one will shop in town if it's just all residential and no car parking. Bad idea.

Brown Street car park is an essential car park in Salisbury, close to the shops and Businesses on that side of the city. It is also the only place to park if you are visiting or staying at the Red Lion hotel.

"No, we still have a need for this carpark in the city centre. I think the push to get more housing is getting out of hand. Was the carpark at Salt Lane a possible alternative? The Quarry plan is an excellent idea and one which is worthy of pursuit. Is there any way of preventing Wiltshire Council from pushing forward with more plans for yet additional housing without the necessary infrastructure eg roads, schools and doctors etc, being in place

"

Reduce the numbers to the amount that can be accommodated on the eastern site only

-

"I agree that Brown Street Car Park should be redeveloped as Salisbury City Centre has an oversupply of parking spaces. However some parking should be retained on the west side of Brown Street for disabled drivers so that they have easy access to Catherine Street. The housing development could be car-free as it is an ideal location for walking and cycling with good access to public transport .

With careful consideration the building need not obscure views of the Cathedral, as mentioned by another respondent, or add to traffic if car-free occupancy is mandated.

On the east side of Brown Street I would suggest residential parking provision in order to remove on-street parking from surrounding streets. This would be secure with CCTV and electric charging points enabling city centre residents to switch to electric cars. The removal of on-street parking would allow widening of pavements and the provision of cycleways and greatly improve the street scene in this area of the Chequers."

-

Find some other land to put this on (not a well-used car park), drop the needless 'imaginative design' stipulation which will only add more jarring modern architecture to a fairly harmonious city centre, and I would otherwise have no problem.

Culver street car park would need to be staffed 24 hours per day to make it feel safe for females to use.

-

Use land on the central car park

I think you must provide adequate parking for the health centre - and also for the flats. In fact I don't think you should have too many flat there Because of air pollution from the two roads, I don't think it's a suitable place for flats/housing. I think one really good health care centre would be excellent with good parking facilities, the electric vehicle charging point and perhaps some adequate parking for disabled shoppers,

This would be a great use for the site, and much better than the current car park, which contributes to the air quality issues in the centre of Salisbury. Accessible health care in the city centre is very much needed.

It would be nice for there to be some kind of community growing space; particularly in conjunction with the healthcare facilities. There are examples of community planting projects aimed at people who are struggling with the mental health. This would also fit into any "green" aims of the development plan.

-

Leave Brown Street car park as it is but offer at least 30 minutes parking. Improve signage, meters and layout. If finance is available have pay on exit. The city had/has medical centre at Millstream. Wait until river project is completed to reassess.

Brown Street should remain a car park. It is essential to the businesses that are within walking distance of the car park. Reducing the car park will result in more empty premises. The car park

should be enhanced to include two coach parking bays. Free wi-fi should be provided across the area.

-

Brown Street car park is vital to support local businesses. It MUST remain!

Underground parking should be part of the mix.

Could Culver Street multi storey car park be turned over to private residential use only, with perhaps an annual charge to cover running costs. This could then be used for the new dwellings in Brown Street, which in turn could help reduce traffic in the city centre. Although a drop off point to allow people to deliver and collect from houses in Brown Street wouldn't be required

"To be honest I don't think the centre of Salisbury should be taken over entirely by housing. You could have a quiet area with more trees if you don't want to keep car parking. And have a few spaces for car charging adjacent to existing housing near the back of the pub.

NDP response




DESIGN GUIDE FOR SALISBURY – Title changed to “Salisbury design and advertising guide”

Note to the Examiner – the responses to the two design guides, alongside changes arising from the 2023 National Green Infrastructure Framework have led to a comprehensive rewriting of the Design Guide and the shopfront design guide which have now been merged into a single document. The table below shows how individual responses led to changes. However, since the documents have been significantly changed and sections moved, it was not possible to give a clear and comprehensible tracking system showing how changes were made in relation to moving sections around and updating for new national policy on green and blue infrastructure.

Responses Log Design Guide

1

Purpose of this log is the provision of a complete record of handling of all response items. Actions, where appropriate, are incorporated in marked up Word copy of reg 14 document. Meaning of mark-ups:

 ok	Included in revised document draft	 na	No action	 oos	Out of scope
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Content & Hyperlinks

[WC](#) [2](#)

[RD](#) [7](#)

[Green Space P](#) [13](#)

Responses Log Design Guide

2

Purpose of this log is the provision of a complete record of handling of all response items. Actions, where appropriate, are incorporated in marked up Word copy of reg 14 document. Meaning of mark-ups:



Included in revised document draft



No action



Out of scope

[Go to Content](#)

Responses from WC

NDP Design Guide



General: this is the Creating Places document with minor changes. It was written for the whole of South Wiltshire, and so includes some details that do not apply within the city.



General: Green roofs on bus stops: a bus stop infrastructure design guide will seek to specify green roofs within an AQMA (i.e. Salisbury City Centre) and solar panel roofs on bus stops outside the city centre (we're flexible if green roofs in other locations outside the centre are specified). It would be helpful for this to go into the NDP since the bus stop design guide hasn't been written yet.



Para 59: traditional timber cladding would be barred by this requirement. There is relatively little within the city, it being a more common feature of rural agricultural buildings than dwellings. Battens for tile hanging and mathematical tiles are also timber...



Para 60: the only thatched buildings are in Stratford-sub-...

Commented [HDS36]: Design Guide
Para 60: both are within the NP area

Responses Log Design Guide

3

Meaning of mark-ups:



Included in revised document draft



No action



Out of scope

Commented [HDS37R36]: Para 66
WC is a complete outlier by blocking design review/peer review

.....

Para 66: not convinced that requiring peer review is possible. It only seems reasonable to require full details where the potential impact of a scheme is unclear. Outline applications (and related prior notifications) are subject to the expectations of sections 66 and 72 of the PLBCA Act 1990 to protect the character and setting of listed buildings and conservation areas, and NPPF paras 194,195 so more details will usually be required. It is rare for an outline app to be submitted in the City CA, but for sites not within a CA or adjacent to a LB it would usually be appropriate to establish the principle and deal with details later.



Para 70: this assertion that buildings of flats should have balconies is inappropriate, these are not a feature of any streetscene in Salisbury.



Para 73. This is already Wiltshire Council policy.



Para 74. The screening can be more of a streetscene issue than the bins (which are certainly unsightly). Bins should be accommodated within buildings (or rear yards) wherever physically possible.



Para 88: Please clarify: 'Planting around new buildings and within access routes to wider boundaries is sought as an essential component of good design'.






Para 94. If solar panels are required on all new developments, does this mean they're considered to have no visual impact?





Responses Log Design Guide


4


Meaning of mark-ups:


 Included in revised document draft  No action  Out of scope

Para 96. This seems wholly unachievable through the planning process. Would timber windows not be deemed 'difficult to maintain'? 

LBS&CAs section. This does emphasise the value of heritage but introduces no policies or guidance not already available from Wiltshire Council and Historic England. 

Para 120. Reference to replacement windows must be accompanied with a warning that they will always require Listed Building Consent. 

Para 121. This is already covered by the NPPF. 

Para 129. Entries on the RPG are not normally referred to as 'listed landscapes'. There are other scheduled monuments. 

Para 134. Is already a national requirement. 





Para 135. Depends what 'poor and generic' mean... it is suggested to delete both, and start from 'Designs which take'. 

Illustration bottom p31. It can be argued that this particular building does not reflect the historic pattern of development at all – the frontage here was historically continuous, without the gaping hole for the vehicular access. 




P33 lower illustrations (and many others through the document) – no explanatory captions, not obviously related to nearby text. 


Para 144. It isn't necessarily appropriate to 'green the urban landscape' of the city, the streets are mostly historically devoid of all greenery 


Responses Log Design Guide


5


Meaning of mark-ups:


 Included in revised  No action  Out of scope


Para 150. Conservatories rarely need planning permission on unlisted buildings. This seems unnecessarily prescriptive, given the very limited impact on the public realm. 


P38 illustration. What is this intended to illustrate? Obviously, the top-hung upvc windows to the left are untraditional; the others appear also to be upvc but closer to the original appearance. 


Para 151/152. Replacement of windows in unlisted dwellings does not need permission. 


Para 156. Upper floor windows are often *shorter* in traditional buildings. 


Para 158. Traditional glazing bars are not carved into ornate shapes externally. 

Para 159. The normal position for C18/C19 windows is about 100mm back from the face, but older windows (of which there are many in Salisbury) are usually flush with the face. Window position should be appropriate to the architectural style. 

Para 160. Has reference to 'the district' (i.e. SDC). 


Para 163. Not all suburbs are created equal – the upvc replacements in Belle Vue (not in CA, no LBs) have detracted from its near-uniform character. 


Para 164. The link does not work. 


Para 165. This is incorrect and must be changed or it could be problematic. The first sentence should read: *Listed Building Consent is always required for window modifications for a listed building*. This is to prevent unjustified loss of historic windows. 

Responses Log Design Guide

Meaning of mark-ups:

- 

ok Included in revised document draft
- 

na No action
- 

oos Out of scope

Respondent name
Environment Agency
Respondent comment
<p>Design Guide – The use of water As acknowledged on page 25 of the design guide, efficient use of water in new developments is important. This area is considered a ‘water stressed area’ as of 2021 - Water stressed areas – 2021 classification - GOV.UK (www.gov.uk), Written statements - Written questions, answers and statements - UK Parliament. Water availability is likely to become one of the most challenging aspects of climate change adaptation. Therefore we would encourage the Plan to include a water usage target figure for new End 2 developments and refurbishments. Currently the lowest enforceable target is 110 litres per person per day, under current building regulations. The Environment Agency has seen some developers propose water usage levels of under 100 litres, therefore we would encourage the Steering Group to consider including an ambitious target for water usage in residential developments.</p>




ok

Insertion after para 108

Responses Log Design Guide

7

Meaning of mark-ups:

 Included in revised  No action  Out of scope

[Go to Content](#)

Respondent name
RD for Civic Society
Respondent comment
Salisbury Neighbourhood Plan Part 4 – A Design Guide for Salisbury Comments by Richard Deane

Photos: a particular focus of these comments, and of photos which will be submitted alongside them, is a view that many of the photos of the guide as it stands are attractive general depictions of the city, rather than images which make particular design points. This starts with the **cover**, whose image has no obvious design relevance beyond conveying the attractive character of the historic city. The **Bourne Hill extension** is suggested later on as something which really needs to be in the guide, to convey the potential of first-class contemporary design. There may be a case for starting the guide with it, on the cover.





Para 5, page 4: 'This guide offers advice on design for all developments, whether they be large housing estates, commercial premises or small extensions'. In fact there's very little that covers the very important but very difficult subject of how to design successful new estates.



Responses Log Design Guide

8

Meaning of mark-ups:

ok Included in revised **na** No action **oos** Out of scope

Respondent name
RD for Civic Society
Respondent comment
Salisbury Neighbourhood Plan Part 4 – A Design Guide for Salisbury Comments by Richard Deane

Page 9: Captions are generally missing where images are new ones, rather than ones imported from Creating Places. The photo on this page is a good one, but it might not hurt if it was accompanied by an indication of its message. Something like **'An attractive scene in the Market Place, showing how different historic styles can combine to create successful streetscapes'**.

ok

Page 14, materials: The images in the box have scope for improvement. Bottom right, the 'crude junction between brickwork and mathematical tiles' is in fact just what happens when different materials, probably from different periods, appear in juxtaposition to each other, and there is no obvious way this junction could be improved. **Suggest remove this image, and replace it with submitted photo 1, showing a contrast between original pointing to a historic brick wall (in Gigant Street), and an ill-considered recent pointing exercise.**

ok

Responses Log Design Guide

9

Meaning of mark-ups:



Included in revised document draft



No action



Out of scope

The ribbon pointing image does not really indicate, at this scale, the adverse effects of this technique, and might be **replaced by submitted photo 2, from St Martins Church Street.**



Page 17 photo: In a section on building design, it's not clear what the message this image is conveying might be.



Para 72, page 17: **'Salisbury has been developed around five rivers'**. A minor point, but Salisbury has actually been **developed around two rivers** – the Avon and the Nadder, into which the Wylde flows at Quidhampton. The Bourne, for most of its length locally until the final stretch going into the Avon, forms the boundary between Salisbury parish and Laverstock parish, so a neighbourhood plan for Salisbury parish can hardly say the city has been developed around it. The Ebbel comes nowhere near Salisbury parish. a clear traditional context to be followed'. These words were originally followed, at the start of






para 77, with 'However, this trend has been used as a design solution for types of new development for which it is entirely inappropriate', which all made perfect sense.



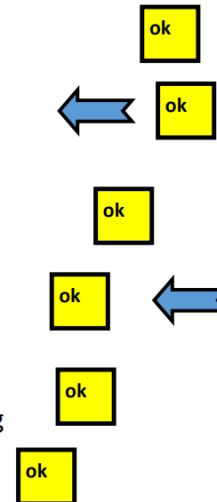
Responses Log Design Guide

10

Meaning of mark-ups:

-  Included in revised document draft
-  No action
-  Out of scope

Paras 75-77, page 18: Paras 75 and 77 are transplanted from Creating Places, whereas para 76 is a new one. More work needs to be done to accommodate it. Para 75 ends 'The use of a familiar style can be a very successful and 'safe' approach when dealing with new development where there is a clear traditional context to be followed'. These words were originally followed, at the start of para 77, with 'However, this trend has been used as a design solution for types of new development for which it is entirely inappropriate', which all made perfect sense. Now, though, the 'However this trend has been used as a design solution for which it is entirely inappropriate' follows directly on from the end of Para 76 words 'Opportunities for modern, contemporary design buildings are encouraged'. It is clearly not the intention that this should be followed by a statement that such design is inappropriate, and some reorganisation of wording is need to restore sense to this part of the design guide. Reversing the order of para 76 and 77 might be a simple, though not perfect, way of achieving this.



Responses Log Design Guide

11

Meaning of mark-ups:



Included in revised document draft



No action



Out of scope

Page 18, photos: The reference at the top of the second column to the need for modern, contemporary design, where appropriate, is then followed by a **photo of the cathedral**, i.e. the exact opposite to modern and contemporary, plus two lightshow images which **serve no obvious purpose**. This page would be the ideal place to have an **image of the Bourne Hill extension (photo 3), unless** it's used for the front cover.



Photos 13-20 in the submitted batch are also intended to depict good contemporary design, and if space is tight, there are plenty of subsequent places in the guide where such photos could be substituted for existing ones which have little to say about good design.

Page 19, Public Art: The photo almost loses the public art in a background of trees. Submitted **photo 4 is a clearer image** of the same artwork. It needs a caption something like **'Formation 1, by Conrad Shawcross, in the Cathedral Close'**. However if there is only room for one public art image, it would be better to replace this one with one of the



Turning Point sculpture in Guildhall Square. Photo 5 shows it, but there will certainly be better photos around – for instance the one in the flier for the Turning Point opening on October 15th .



Responses Log Design Guide

Meaning of mark-ups:



Included in revised document draft



No action



Out of scope

Page 21, photo: Caption needed, which could say almost anything – **'Dense layout of central Salisbury, with heights restricted to prevent competition with the cathedral spire'** would be one option. There are buildings of design interest shown, but not at sufficient scale to merit picking them out.



Page 24, photo: Where is this (not obviously Salisbury) and what is it showing? Its space could usefully be taken up by one or more of the submitted images.



Page 27, photo: Unclear what a photo of Old Sarum is contributing to a section on listed buildings and conservation areas.



Para 123, page 28: The link to the city of Salisbury conservation area appraisal and management plan should logically be accompanied by links to the equivalent documents for the Old Manor Hospital and Milford Hill conservation areas. All three documents were formally adopted at the same time.



Page 30, photo: This photo has little to say about smaller scale housing development.

Page 31, upper image: The annotations on this drawing are illegible. It needs to be expanded to full page width.



Responses Log Design Guide

13

Meaning of mark-ups:

- ok Included in revised document draft
- na No action
- oos Out of scope

Respondent name
Salisbury Area Greenspace Partnership
Respondent comment
<p>Design Guide</p> <p>Overall, this document would benefit from condensing. Is also a little confusing & repetitive in places. Need for closer integration of Design Guide text with text in Part 2 & cross referencing.</p> <p>Introduction could include a reference to other important changes including climate change & biodiversity loss, the Environment Act 2021, new Biodiversity Net Gain requirements, need for sustainable development & sustainable use of land (NPPF). An apt quote from Dame Glenys Stacey, Chair of the recently formed Office for Environmental Protection, could be included: <i>'sustainable development & sustainable use of land is</i></p>

na

na

Responses Log Design Guide

14

Meaning of mark-ups:



Included in revised document draft



No action



Out of scope

p4 Good design should be sustainable but sustainability is not mentioned here either. It is also about creating a sense of place (NPPF) & respecting the genius loci.



p6 Landscape & local context - there is a strong crossover between building & landscape design & both of these sections of the Guide should encourage greater integration. To support the SNDP vision for sustainable development & truly multifunctional GBI & for landscape setting reasons, the Guide would benefit from giving a clearer message about importance of major developments being landscape-led eg. housing, retail, commercial, industry for local sites such as Churchfields & the Maltings for example.



The Landscape & local context section is missing any information about green & blue infrastructure. Species selection also needs to include information about structural trees & be more specific use of native species. Some repetition needs addressing & some references need to be revisited. Boundary treatments would benefit from mentioning the importance of maintaining the character of street frontages eg. boundary walls, railings, hedges & discouraging the loss of front garden spaces often to hard surfaces for car parking. Also use of porous surfaces if no alternative.



Responses Log Design Guide

15

Meaning of mark-ups:



Included in revised document draft



No action



Out of scope

P10 Add Information about buffer zones & treatment of riverbanks. Para 72 in section on Building Design mentions rivers but need for consistency in terms of advice & guidance provided. See also Part 2 document p81 para 190. Could be cross referenced.



P11 para 46 also highlight need for long term management plans to be in place. Para 47 - information on Street Trees could be expanded



Landscape & Visual Impact assessments referred to in Pt 2 document p61 & should be picked up in DG or cross referenced.



The section on Biodiversity Net gain may need updating & further clarification.



Habitat Regs – perhaps a reference is needed here about the need for compliance & development affecting New Forest SPAI & R Avon SAC & demonstration of phosphate neutrality.

P15 Materials – this section seems out of place here. Also, paras 57 – 62 are concerned with materials but para 63 is unrelated. However, it touches on some important features to support biodiversity eg bird boxes etc etc which needs expanding in a dedicated section.



Responses Log Design Guide

16

Meaning of mark-ups:



Included in revised document draft



No action



Out of scope

P21 para 88 – isolated comments about planting don't seem helpful



p65 para 140 – all major development schemes should be supported by an audit of existing GBI this should be in the DG



p24 Suggest heading should read: Sustainable Drainage & should be a reference to CIRIA & the 4 pillars of Sustainable Drainage. Para 103 needs to include rain gardens & refer to



specially adapted tree pits which also work as soakaways. Also needs to be a heading & some text re sustainable transport – electric charging points, cycle storage & connectivity to local walking & cycling routes



p25 Checklist for achieving a sustainable design is an excellent idea & would benefit from being in a dedicated box. Not sure if this is the right place for it. Also needs to be expanded to include green walls & roofs, permeable hard surfaces, tree, shrub & hedgerow planting, use of native species, bird boxes, bat boxes, integral swift bricks, hedgehog highways etc & a separate bullet point re connectivity to existing cycling & walking routes. Perhaps the last bullet point should be first.



P35 What about large retail development – ASDA currently has a planning application in for the London Road site



P44 Walls, fences, gates & other boundaries – could be integrated with information on pages 10 & 11 as seems repetitive & rather confusing



Responses Log Design Guide

17

Meaning of mark-ups:



Included in revised document draft



No action



Out of scope

[Go to Content](#)

P7 Image needs title & annotation



Pages 9, 10 & 11 images don't relate well to text. SAGP could help supply more appropriate images



Images of green roofs, wall, screens etc would be useful

Respondent name

Wiltshire Council

Respondent comment

NDP Design Guide

General: this is the Creating Places document with minor changes. It was written for the whole of South Wiltshire, and so includes some details that do not apply within the city.

General: Green roofs on bus stops: a bus stop infrastructure design guide will seek to specify green roofs within an AQMA (i.e. Salisbury City Centre) and solar panel roofs on bus stops outside the city centre (we're flexible if green roofs in other locations outside the centre are specified). It would be helpful for this to go into the NDP since the bus stop design guide hasn't been written yet.

Para 59: traditional timber cladding would be barred by this requirement. There is relatively little within the city, it being a more common feature of rural agricultural buildings than dwellings. Battens for tile hanging and mathematical tiles are also timber.

Para 60: the only thatched buildings are in Stratford-sub-Castle and Harnham, rather than the city itself.

Para 66: not convinced that requiring peer review is possible. It only seems reasonable to require full details where the potential impact of a scheme is unclear. Outline applications (and related prior notifications) are subject to the expectations of sections 66 and 72 of the PLBCA Act 1990 to protect the character and setting of listed buildings and conservation areas, and NPPF paras 194,195 so more details will usually be required. It is rare for an outline app to be submitted in the City CA, but for sites not within a CA or adjacent to a LB it would usually be appropriate to establish the principle and deal with details later.

Para 70: this assertion that buildings of flats should have balconies is inappropriate, these are not a feature of any streetscene in Salisbury.

Para 73. This is already Wiltshire Council policy.

Para 74. The screening can be more of a streetscene issue than the bins (which are certainly unsightly). Bins should be accommodated within buildings (or rear yards) wherever physically possible.

Para 88: Please clarify: 'Planting around new buildings and within access routes to wider boundaries is sought as an essential component of good design'.

Para 94. If solar panels are required on all new developments, does this mean they're considered to have no visual impact?

Para 96. This seems wholly unachievable through the planning process. Would timber windows not be deemed 'difficult to maintain'?

LBs&CAs section. This does emphasise the value of heritage but introduces no policies or guidance not already available from Wiltshire Council and Historic England.

Para 120. Reference to replacement windows must be accompanied with a warning that they will always require Listed Building Consent.

Para 121. This is already covered by the NPPF.

Para 129. Entries on the RPG are not normally referred to as 'listed landscapes'. There are other scheduled monuments.

Para 134. Is already a national requirement.

Para 135. Depends what 'poor and generic' mean... it is suggested to delete both, and start from 'Designs which take'.

Illustration bottom p31. It can be argued that this particular building does not reflect the historic pattern of development at all – the frontage here was historically continuous, without the gaping hole for the vehicular access.

P33 lower illustrations (and many others through the document) – no explanatory captions, not obviously related to nearby text.

Para 144. It isn't necessarily appropriate to 'green the urban landscape' of the city, the streets are mostly historically devoid of all greenery.

Para 150. Conservatories rarely need planning permission on unlisted buildings. This seems unnecessarily prescriptive, given the very limited impact on the public realm.

P38 illustration. What is this intended to illustrate? Obviously, the top-hung upvc windows to the left are untraditional; the others appear also to be upvc but closer to the original appearance.

Para 151/152. Replacement of windows in unlisted dwellings does not need permission.

Para 156. Upper floor windows are often *shorter* in traditional buildings.

Para 158. Traditional glazing bars are not carved into ornate shapes externally.

Para 159. The normal position for C18/C19 windows is about 100mm back from the face, but older windows (of which there are many in Salisbury) are usually flush with the face. Window position should be appropriate to the architectural style.

Para 160. Has reference to 'the district' (i.e. SDC).

Para 163. Not all suburbs are created equal – the upvc replacements in Belle Vue (not in CA, no LBs) have detracted from its near-uniform character.

Para 164. The link does not work.

Para 165. This is incorrect and must be changed or it could be problematic. The first sentence should read: *Listed Building Consent is always required for window modifications for a listed building.* This is to prevent unjustified loss of historic windows.

Para 168. Dormers feature on many traditional buildings in Salisbury. Modern building regs and insulation expectations make it very difficult to achieve a similar appearance.

Para 169. The dormers need to be set back from and above the eaves, and below the ridge. Dormers in traditional buildings are primarily for light, whereas most modern dormers seek to provide headroom in an attic conversion. Traditional dormers usually have no rainwater goods.

Para 182. Most porches do not require planning permission (but clearly there is no harm in saying what's preferable for those that do).

Para 191. Satellite dishes on walls/chimneys facing a highway require planning permission. Broadband and cable TV options are now widely available in the city: satellite dishes and aerials are increasingly no longer in use and should be removed. Satellite dishes and some aerials on listed buildings require LBC.

Para 191. The guidance re solar panels should have been cross-referenced in para 94 and policy 3. Policy 3 appears to be expected to apply to LBC as well as planning applications. This isn't technically possible through a NDP.

Para 200. Might be worth referring to 'up-and-over' doors being unacceptable. At the back of the pavement, they also pose a hazard to pedestrians. Vertical roller-shutter doors are becoming popular, they are also rarely appropriate for historic buildings or settings, although can work well in a modern context.

NDP response

Changes made – thanks for the helpful comments. Some changes have not been made because the guidance is seeking to do something new such as add more greenery into the city centre for carbon capture and improved air quality.

Respondent name

Environment Agency

Respondent comment

Design Guide – The use of water As acknowledged on page 25 of the design guide, efficient use of water in new developments is important. This area is considered a 'water stressed area' as of 2021 - Water stressed areas – 2021 classification - GOV.UK (www.gov.uk), Written statements - Written questions, answers and statements - UK Parliament. Water availability is likely to become one of the most challenging aspects of climate change adaptation. Therefore we would encourage the Plan to include a water usage target figure for new End 2 developments and refurbishments. Currently the lowest enforceable target is 110 litres per person per day, under current building regulations. The Environment Agency has seen some developers propose water usage levels of under 100 litres, therefore we would encourage the Steering Group to consider including an ambitious target for water usage in residential developments.

NDP response

New section added.

Respondent name

RD for Civic Society

Respondent comment

Salisbury Neighbourhood Plan Part 4 – A Design Guide for Salisbury
Comments by Richard Deane

These comments are submitted as personal ones, though they follow discussion at meetings of the Salisbury Civic Society's Development Committee, particularly that of September 6th 2022.

Photos: a particular focus of these comments, and of photos which will be submitted alongside them, is a view that many of the photos of the guide as it stands are attractive general depictions of the city, rather than images which make particular design points. This starts with the cover, whose image has no obvious design relevance beyond conveying the attractive character of the historic city.

The Bourne Hill extension is suggested later on as something which really needs to be in the guide, to convey the potential of first-class contemporary design. There may be a case for starting the guide with it, on the cover.

Para 5, page 4: 'This guide offers advice on design for all developments, whether they be large housing estates, commercial premises or small extensions'. In fact there's very little that covers the very important but very difficult subject of how to design successful new estates.

Page 9: Captions are generally missing where images are new ones, rather than ones imported from *Creating Places*. The photo on this page is a good one, but it might not hurt if it was accompanied by an indication of its message. Something like 'An attractive scene in the Market Place, showing how different historic styles can combine to create successful streetscapes'.

Page 14, materials: The images in the box have scope for improvement. Bottom right, the 'crude junction between brickwork and mathematical tiles' is in fact just what happens when different materials, probably from different periods, appear in juxtaposition to each other, and there is no obvious way this junction could be improved.

Suggest remove this image, and replace it with submitted photo 1, showing a contrast between original pointing to a historic brick wall (in Gigant Street), and an ill-considered recent pointing exercise.

The ribbon pointing image does not really indicate, at this scale, the adverse effects of this technique, and might be replaced by submitted photo 2, from St Martins Church Street.

Page 17 photo: In a section on building design, it's not clear what the message this image is conveying might be.

Para 72, page 17: 'Salisbury has been developed around five rivers'. A minor point, but Salisbury has actually been developed around two rivers – the Avon and the Nadder, into which the Wylfe flows at Quidhampton. The Bourne, for most of its length locally until the final stretch going into the Avon, forms the boundary between Salisbury parish and Laverstock parish, so a neighbourhood plan for Salisbury parish can hardly say the city has been developed around it. The Ebble comes nowhere near Salisbury parish.

Paras 75-77, page 18: Paras 75 and 77 are transplanted from *Creating Places*, whereas para 76 is a new one. More work needs to be done to accommodate it. Para 75 ends 'The use of a familiar style can be a very successful and 'safe' approach when dealing with new development where there is a clear traditional context to be followed'. These words were originally followed, at the

start of para 77, with 'However, this trend has been used as a design solution for types of new development for which it is entirely inappropriate', which all made perfect sense.

Now, though, the 'However this trend has been used as a design solution for which it is entirely inappropriate' follows directly on from the end of Para 76 words 'Opportunities for modern, contemporary design buildings are encouraged'. It is clearly not the intention that this should be followed by a statement that such design is inappropriate, and some reorganisation of wording is need to restore sense to this part of the design guide.

Reversing the order of para 76 and 77 might be a simple, though not perfect, way of achieving this.

Page 18, photos: The reference at the top of the second column to the need for modern, contemporary design, where appropriate, is then followed by a photo of the cathedral, i.e. the exact opposite to modern and contemporary, plus two lightshow images which serve no obvious purpose. This page would be the ideal place to have an image of the Bourne Hill extension (photo 3), unless it's used for the front cover.

Photos 13-20 in the submitted batch are also intended to depict good contemporary design, and if space is tight, there are plenty of subsequent places in the guide where such photos could be substituted for existing ones which have little to say about good design.

Page 19, Public Art: The photo almost loses the public art in a background of trees. Submitted photo 4 is a clearer image of the same artwork. It needs a caption something like 'Formation 1, by Conrad Shawcross, in the Cathedral Close'.

However if there is only room for one public art image, it would be better to replace this one with one of the Turning Point sculpture in Guildhall Square. Photo 5 shows it, but there will certainly be better photos around – for instance the one in the flier for the Turning Point opening on October 15th.

Page 21, photo: Caption needed, which could say almost anything – 'Dense layout of central Salisbury, with heights restricted to prevent competition with the cathedral spire' would be one option. There are buildings of design interest shown, but not at sufficient scale to merit picking them out.

Page 24, photo: Where is this (not obviously Salisbury) and what is it showing? Its space could usefully be taken up by one or more of the submitted images.

Page 27, photo: Unclear what a photo of Old Sarum is contributing to a section on listed buildings and conservation areas.

Para 123, page 28: The link to the city of Salisbury conservation area appraisal and management plan should logically be accompanied by links to the equivalent documents for the Old Manor Hospital and Milford Hill conservation areas. All three documents were formally adopted at the same time.

Page 30, photo: This photo has little to say about smaller scale housing development.

Page 31, upper image: The annotations on this drawing are illegible. It needs to be expanded to full page width.

Page 32, upper photo: Some form of caption is needed, if only to identify the building as the one housing the Salisbury campus of Wiltshire College.

Page 33, photos: Unclear what message these three photos have. If they were removed, the consequent shortening of the 'commercial and industrial development' section might free up space elsewhere for design-related photos.

Page 34, photo: Caption needed, to establish exactly what message is being conveyed.

Page 35, photo: Caption needed, to establish exactly what message is being conveyed.

Page 36, house extensions: This section cries out for illustrations, particularly ones covering the point made that 'There are occasions when a bold modern design can be an effective way of extending an older property.'

The submitted images (photos 6, 7 & 8) show one very traditional extension, in fact so in keeping with the original house of c.1900 that it's impossible to tell that the house has been extended on its right-hand side, and two extensions in a contemporary style, one behind an unlisted building in a historic chequers location, and one behind a listed house in the Cathedral Close.

Page 38, photo: This would benefit from a caption, to stress the point that's being made by it. Something like 'Original timber windows on the right, crude plastic replacements on the left'.

Page 40, photo: In a section on windows, this photo has no message to convey. It could be replaced by submitted photos 9 and 10, illustrating para 159's point about the value of setting new windows back behind a reveal, in cases where they're trying to mimic traditional windows from the periods where such reveals were standard.

Para 164, page 41: The link in this para appears not to work.

The remaining submitted photos, N^os 11-20, are all put forward as examples of good design, both in a traditional vein and a contemporary one. All are from Salisbury, apart from photos 19 & 20, which show Ridding Court, a recent development in central Winchester, which is a better example of a 'contemporary Georgian' approach than anything to be seen in Salisbury. I hope some at least of these photos can be added in appropriate places in the guide.

NDP response

Respondent name

Salisbury Area Greenspace Partnership

Respondent comment

Design Guide

Overall, this document would benefit from condensing. Is also a little confusing & repetitive in places. Need for closer integration of Design Guide text with text in Part 2 & cross referencing.

Introduction could include a reference to other important changes including climate change & biodiversity loss, the Environment Act 2021, new Biodiversity Net Gain requirements, need for sustainable development & sustainable use of land (NPPF). An apt quote from Dame Glenys Stacey, Chair of the recently formed Office for Environmental Protection, could be included: *'sustainable development & sustainable use of land is essential to overcome the very real threats to the environment. Nature recovery has to be supported at every level'*.

p4 Good design should be sustainable but sustainability is not mentioned here either. It is also about creating a sense of place (NPPF) & respecting the genius loci.

p6 Landscape & local context - there is a strong crossover between building & landscape design & both of these sections of the Guide should encourage greater integration. To support the SNDP vision for sustainable development & truly multifunctional GBI & for landscape setting reasons, the Guide would benefit from giving a clearer message about importance of major developments being landscape-led eg. housing, retail, commercial, industry for local sites such as Churchfields & the Maltings for example.

The Landscape & local context section is missing any information about green & blue infrastructure. Species selection also needs to include information about structural trees & be more specific use of native species. Some repetition needs addressing & some references need to be revisited. Boundary treatments would benefit from mentioning the importance of maintaining the character of street frontages eg. boundary walls, railings, hedges & discouraging the loss of front garden spaces often to hard surfaces for car parking. Also use of porous surfaces if no alternative.

P10 Add Information about buffer zones & treatment of riverbanks. Para 72 in section on Building Design mentions rivers but need for consistency in terms of advice & guidance provided. See also Part 2 document p81 para 190. Could be cross referenced.

P11 para 46 also highlight need for long term management plans to be in place. Para 47 - information on Street Trees could be expanded

Landscape & Visual Impact assessments referred to in Pt 2 document p61 & should be picked up in DG or cross referenced.

The section on Biodiversity Net gain may need updating & further clarification.

Habitat Regs – perhaps a reference is needed here about the need for compliance & development affecting New Forest SPAI & R Avon SAC & demonstration of phosphate neutrality.

P15 Materials – this section seems out of place here. Also, paras 57 – 62 are concerned with materials but para 63 is unrelated. However, it touches on some important features to support biodiversity eg bird boxes etc etc which needs expanding in a dedicated section.

P21 para 88 – isolated comments about planting don't seem helpful

p65 para 140 – all major development schemes should be supported by an audit of existing GBI – this should be in the DG

p24 Suggest heading should read: Sustainable Drainage & should be a reference to CIRIA & the 4 pillars of Sustainable Drainage. Para 103 needs to include rain gardens & refer to specially adapted tree pits which also work as soakaways. Also needs to be a heading & some text re sustainable transport – electric charging points, cycle storage & connectivity to local walking & cycling routes

p25 Checklist for achieving a sustainable design is an excellent idea & would benefit from being in a dedicated box. Not sure if this is the right place for it. Also needs to be expanded to include green walls & roofs, permeable hard surfaces, tree, shrub & hedgerow planting, use of native species, bird boxes, bat boxes, integral swift bricks, hedgehog highways etc & a separate bullet point re. connectivity to existing cycling & walking routes. Perhaps the last bullet point should be first.

P35 What about large retail development – ASDA currently has a planning application in for the London Road site

P44 Walls, fences, gates & other boundaries – could be integrated with information on pages 10 & 11 as seems repetitive & rather confusing

Images:

P7 Image needs title & annotation

Pages 9, 10 & 11 images don't relate well to text. SAGP could help supply more appropriate images

Images of green roofs, wall, screens etc would be useful

NDP response

Respondent name

Response from commonplace website

Respondent name
Response from commonplace website
Respondent comment
<p>We need to attract people to our city and make it easy for them to visit. Do you agree? Yeah? I hope so. That's what the design guide is about, yeah? But making the buildings pretty is only a tiny bit of it. The problem we have is the infrastructure. Its all very well legislating private building owners to make the new building pretty but if when visitors stand back to look at the building they get run over, that's no good is it? Think about how it is when we visit a city in the Netherlands or Germany? The council make the pavements wide they plant trees, they put in cooling water features. Then the private building owners make their buildings pretty because they want to!!! So I suggest we, as a society, need can fix the infrastructure. More specifically you need to make pavements wider, think about pedestrian routes, build more city center car parks. Oh I hear you say "but but but but we are a medieval city!". Please, please go and visit Germany. They have lots of medieval cities. They have hundreds of carparking places in the city center. I assure you they are NOT visible. They do not detract the appearance of the city. Please stop spending money on these parochial reports about brickwork. Please spend the money getting the real work done. Fix the pavements, fix the potholes, stop allowing Virgin Media to obstruct electric wheelchairs with their huge green junction boxes. What world are we in? Why are these not miniaturizes? I hope you understand. Sorry for knocking your nice document but frankly that document applies to every old city. We need local stuff done please. Its not even expensive stuff, its pavements and paint. And stop the traffic wardens giving coaches parking tickets for overstaying their 20 mins in Exeter street oppose the white hart. Best regards *****</p> <p>I would like to see Butchers Row turned into a proper medieval street ... get rid of large glass fronts, open up the water channel in the middle of the street .. this needs to be a flowing gutter rather than a stream which children might fall into! What a bout a medieval styled fountain at the far end?</p>
NDP response
Noted.

CLASS E “SHOPFRONT” AND CLASS MA DEVELOPMENT DESIGN GUIDE

Respondent name
Wiltshire Council
Respondent comment
<p><i>NDP Shopfront Design Guide</i></p> <p>It might not be appropriate to mix the design of shopfronts / advertising with guidance for residential conversions. There is very little relationship between the two and readers are likely only to be interested in one or other subject. If someone is converting commercial to residential, they will not be looking for shopfront guidance.</p> <p>The introduction is unhelpful and intermingles observations about shopfronts and Class MA development. Clarity needed about how Class MA prior approval works: it does not grant PD for external changes to the building, as these will still require planning permission. Does this not belong in the Design Guide?</p> <p>Very nearly all of the shopfront part of the document is taken verbatim from a Salisbury District Council publication, currently adopted by Wiltshire Council. This should be acknowledged and merely referenced. The shopfront part is not from Creating Places. There are several inherited spelling mistakes ('facia' most frequently).</p> <p>Figure 1. What purpose does the picture serve: to comment on the unfortunate CCTV installation, junction boxes, rubbish management and the A-board?</p> <p>Figure 4. This is in Mere, not Salisbury.</p> <p>Para 45: I think they should be 'required' rather than 'asked'</p> <p>Para 56: A-boards...it needs to be clear whether all are unacceptable, or whether the Qualifying Body wishes to define what would be tolerable (a guidance/design note covering size, materials and form, for instance). At present, Ox Row is barely passable, more than 50% of its width taken up with tables, bins and huge A-boards.</p>

Para 70. This does not belong in the shopfront section.

Para 71. CAC no longer exists. Planning permission would be required for demolition of a building in the CA – what is the relevance to shopfronts / signage?

New signage issues have arisen since the SDC document was written in 2004/5.

- Signage installed on the stall-riser. No, never.
- Photographic illustration of signs – fascias, hanging signs and window vinyls. I would advocate a presumption against their use. Mostly they appear as vinyls of oversized products – 1m apples or of hair styles for instance and are visually intrusive.
- LED panel signs behind shopwindows. Any illuminated signage within 1m of a window requires advertisement consent. In the spirit of the earlier guidance, these are deemed completely unacceptable.
- Flimsy 'barbers' poles' – these are proliferating and do not add character or quality. They require permission and we have not granted any, but, like the LED panels, if it's in the guidance it won't do any harm.
- Projecting signs. Signs for the online order service, Just Eat, have been installed with no consideration for the need for consent. On an unlisted building, ONE hanging sign (subject to criteria) may be PD, but a second will always require advertisement consent. These signs are not hanging, but a fixed panel, and are not compatible with the historic character of the City CA. Some premises have more than one Just Eat sign.
- Fixed projecting signs. These were formerly a rare proposal, with signs swinging from a bracket being the norm. Fixed signs are untraditional and provide no animation to the streetscene.
- Vertical banners. Whilst these have become more widely available and fashionable, they are almost never appropriate in historic settings. We have had several unauthorised banners removed, but failed with others.

Use of vinyl to obscure whole windows. This is only very rarely acceptable and requires planning permission.

- Installation of CCTV cameras on shopfronts/elevations. These are not universally acceptable, and contribute to the clutter of junction boxes, wires, alarm boxes and other signs. Discreet, preferably colour-matched, cameras are more likely to be approved.

NDP response

Respondent name

Comment from commonplace website

Respondent comment

Town centre can't just be housing or no one will want to go. It should have great meeting spaces and parking and green areas, such as the river fronts should be attractive with places to sit, etc.

I think it is unrealistic to keep “retail” as the desired mainstay of our city in a world which is definitely moving towards “experience” being the paramount consideration for successful cities. It maybe what the policy writers desire but being open to a much wider mix will create a better opportunity for Salisbury to be successful and I've that is based in reality not the past!

This is a good plan. I would also like to see something done about the colours chosen for shop fronts. The Pound Shop in the High Street painted a bright and hideous green and the sweet shop painted an equally hideous purple, also in the high street, are not in keeping with the look of a medieval city. The High Street is an attractive street - spoiled by bright paintwork and large plate glass windows.

I think it would be a start to have everything cleaned & painted & shop bins removed from sight, not sure of a solution, maybe more frequent collections. How does that work with no vehicular access??

Items 34/35 Paint Colours. Would a specific paint chart for Salisbury be a useful guideline for retailers?

NDP response

CHURCHFIELDS MASTERPLAN

Respondent name
Salisbury Area Greenspace Partnership
Respondent comment
<p>Churchfields Design Guidelines & Master Planning</p> <p>A useful check for effectiveness of Design Guide</p> <ol style="list-style-type: none"> 1. Eastern Green Corridor - the proposed eastern green corridor needs to be a generous buffer zone enhanced with new tree planting & development set back. This would: <ul style="list-style-type: none"> • ensure the crucial screening along the eastern boundary of the site is maintained • protect the rural character of the water meadows, views from the Town Path & the bucolic setting of Salisbury Cathedral – all located within the Salisbury Conservation Area • safeguard the special qualities River Nadder (part of the River Avon SAC & SSSI) • provide amenity greenspace as part of the enhanced green infrastructure for the site 2. Engine Shed Site - the retention of the regenerating woodland habitat on approx. two thirds of the Engine Shed site is welcomed 3. Management Plan for Trees - the document should flag up the importance of a long-term (30 year) management plan for existing trees across the site including the Engine Shed, & for new tree & woodland type planting in the green corridors, especially the eastern corridor in order to maintain the screening effect & including the proposed street trees. 4. Sustainability – the document seems fails to mention the importance of SUDS – & the need to design for the onsite management of surface water runoff. Also to promote much more strongly a sustainable approach to building design & layout & landscape design in line with requirements for new development set out in the SNDP Design Guide. Whilst this is a master planning exercise, it is disappointing that there is no mention of Sustainable Urban Drainage Systems (SUDS) in Ch 5.4 or for the potential for green roofs, green walls & green screens to be incorporated into the building design as they would be very appropriate for this site. Other important SUDS features include rain gardens, adapted tree pits, porous paving for driveways & hardstandings etc to help slow the flow of surface water runoff & improve the quality of the runoff in order to improve benefits for people & support wildlife & biodiversity. 5. Connectivity – is important that any development on this site includes improvements to walking & cycling links with the surrounding area, to support the SNDP’s sustainable transport goals & the goal of achieving a comprehensive network of well-designed cycling & walking routes that are part of Salisbury’s multifunctional green & blue infrastructure. Whilst the text mentions the following potential routes - pedestrian/cycle links, cycle routes & the potential river crossing, they are not clearly identified on the master plan.

NDP response

Respondent name

Wessex Area Team, Natural England.

Respondent comment

Churchfields Masterplan

The design proposals are not consistent with Core Policy 20 objectives (as quoted in Section 2.1) of the site, specifically:

- providing green links from the east and west of the River Nadder, to contribute towards the environmental and ecological aspirations of the Salisbury Vision;
- redevelopment that sympathetically capitalises on the assets of the site, such as proximity to water meadows, town path, Harnham and cathedral views;
- the incorporation of a central green to act as a focal point and encourage vitality;

We note and are surprised that the overarching placemaking principles set out in section 3.2 make no reference to what we suggest is one of the most important principles, namely making the most of the river as a placemaking feature. As a result, the proposals appear to be very weak in this regard.

The two scenarios do not appear to make reference to the river, how to minimise negative impacts and maximise the opportunities the development presents, including how to integrate the land between the site and the river to this end. There is no consideration of a non-vehicular bridge over the river towards Harnham.

As such, the two scenarios appear to be very weak in terms of nature recovery and peoples access to nature.

We note that there is a spring feature marked on the Ordnance Survey map OS. Opportunities should be explored to re-naturalise this.



It is interesting to see that the width of the screening vegetation which could double as enhancing the river-frontage (page 23) which is shown as a good healthy 35-40m wide along the eastern and western sides of the development area is lost later in the report. We recommend that this is retained as a design criteria. Much more could be made of the river as a positive feature in terms of a development opportunity and it is perhaps disappointing that it is reneged to that of a screening buffer.

The proposed designs for opportunity area 3 (Stephenson Road site) provides a welcome blue/green park (or at least the design in Figure 44 does) but both designs rely on the existing

10m wood/scrub/grass buffer along the eastern edge of the northern part of this development area. NE would advise that 10m adjacent to residential property is not a sufficient buffer and an absolute minimum of 30m needs to be considered. That 30m also needs to be semi-natural riparian habitat/informal parkland rather than formal amenity parkland/gardens. This is because of the increased recreational pressure that will arise from residential as opposed to the present commercial usage. Plus other associated impacts such as increased predation of water voles from cats, increased disturbance of otters, increased disturbance from people and lighting to all the riverine wildlife (including informal garden lights as well as street lighting – helped as backs of houses to riverward and trees). The wider the buffer of semi-natural habitat as a natural riparian zone the greater the protection to the river – and contributes to the conservation objectives in restoring the wider river habitat.

Interesting it says (4.3 page 36) *'The houses along the southern edge of the site have been orientated to look towards the meadows along an edge lane'* when in-fact they will look onto woodland!

There is discontinuity – as picked up earlier around the river and then section 2.8 and 3.3 mentions up-to 4 storeys, then in CH01 2. you have no more than 5 storeys

Whilst the area presently lies without the 1:100 year floodzone it would be interesting to know if this remains the case for the 1:500 year scenario? If not, the redevelopment should be shaped around the potential for the area to flood – not the other way round. If there are presently flood embankments along the river top then opportunity should be taken to set these back so that they protect the new development but give the river more riparian space.

As the Nadder is part of the River Avon Special Area of Conservation, Natural England has a particular interest in the plans for this site, and we would welcome further involvement in developing proposals of this site. Any adopted plan for this site would be subject to a Habitat Regulations Assessment.

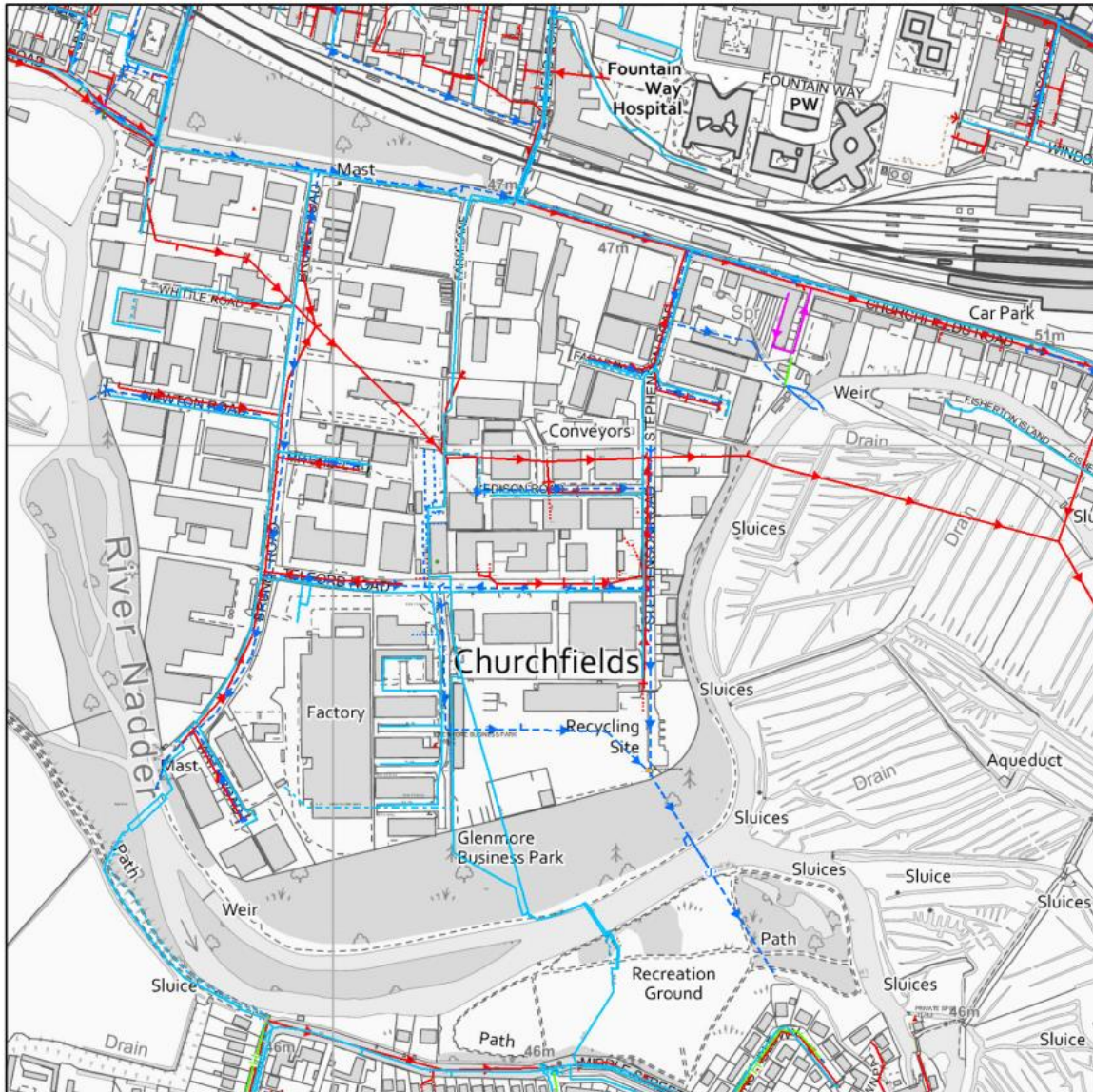
NDP response

Respondent name

Wessex Water

Respondent comment

Churchfields Masterplan



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WATER MAINS	SEWERS	PUBLIC PRIVATE SECTION 104	OTHER WESSEX PIPES	NON-WESSEX / UNKNOWN
<ul style="list-style-type: none"> Distribution Main Washout Main Raw Water Main Abandoned Main Private Main 	<ul style="list-style-type: none"> Foul Surface Combined Abandoned 	<ul style="list-style-type: none"> Public Private Section 104 	<ul style="list-style-type: none"> Rising Mains Standby Rising Mains Effluent Disposal Overflow Syphon 	<ul style="list-style-type: none"> Private Rising Mains Culverted Watercourse Highway Drain Use Unknown Status Unknown
SITES <ul style="list-style-type: none"> Source Reservoir Pump Treatment Works 	STRUCTURES <ul style="list-style-type: none"> Manhole - Foul Manhole - Surface Manhole - Combined Outfall Inlet Lamphole Bifurcation - Foul Bifurcation - Surface Bifurcation - Combined Combined Sewage Overflow 	<ul style="list-style-type: none"> Pumping Station - Surface Pumping Stn - Foul/Combined Gully Vent Column Rodding Eye Catchpit Flushing Chamber Soakaway Non Return Valve Washout Air Valve Hatch Box 	OTHER STRUCTURES <ul style="list-style-type: none"> Attenuation Tank Storage Tank Chamber Tunnel Interceptor 	
FITTINGS <ul style="list-style-type: none"> Valve - Open Valve - Closed Fire Hydrant Pressure Reducing Valve Meter 				

Colours generally indicate the use of the sewer/drain (i.e. Red - Foul, Dark Blue - Surface, Magenta - Combined/Dual Use, Light Green - Highway Drain, Mid Green - Overflow) styles of line are shown on the key in sample/typical colours.

Information in this plan is provided for identification purposes only. No warranty as to accuracy is given or implied. The precise route of pipe work may not exactly match that shown. Wessex Water does not accept liability for inaccuracies. Sewers and lateral drains adopted by Wessex Water under the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011 are to be plotted over time and may not yet be shown. In carrying out any works, you accept liability for the cost of any repairs to Wessex Water apparatus damaged as a result of your works. You are advised to commence excavations using hand tools only. Mechanical digging equipment should not be used until pipe work has been precisely located. If you are considering any form of building works and pipe work is shown within the boundary of your property or a property to be purchased (or very close by) a surveyor should plot its exact position prior to commencing works or purchase. Building over or near Wessex Water's apparatus is not normally permitted.

Date: 12/09/2022, 15:11:07
Scale: 1:5,000
Centre: 413,199, 129,905

The proposed redevelopment of Churchfields offers opportunities for surface water separation and the installation of Sustainable Drainage Systems (SuDS). When managing surface water best practice is to mimic the natural state of the site prior to development, installing SuDS can help achieve this. SuDS are designed to hold the surface water on site (attenuate) and then release (discharge) slowly to the environment through the SuDS hierarchy. Where there are historic surface water connections to combined sewers redevelopment can offer the opportunity to deliver surface water separation which has multiple benefits (including freeing up capacity for development and alleviate flooding)

2 Lower Road Site

There is an existing sewer which crosses the southwestern corner of the site which is shown on the attached asset plan. Please see our website for further details about how this may impact redevelopment proposals

<https://www.wessexwater.co.uk/services/building-and-developing/building-near-or-over-a-minor-public-sewer>

3 Shepston Road Site

We encourage early consultation on development proposals to consider how they may affect the location and capacity of our water and drainage assets, including underground pipes and tanks and above ground operational sites. There is existing infrastructure crossing the site which will affect the proposed layout. There are underground distributor water mains. There is also a Sewage Pumping Station on the site. Please see the attached asset plan and our guidance note. To avoid a possible objection by us or adjustments to the site layout, we recommend arrangements are agreed with us before a planning application is submitted.

NDP response

Respondent name

Respondent from Commonplace

Respondent comment

Churchfields Master Plan

Generally, I think the master plan design for all three sites is far too suburban. I find it hard to believe the designers have suggested 2 storey, semi-detached houses with front, side and back gardens in such a central location and so close to spectacular amenity space and the city itself. It is as if they do not want to believe Salisbury is a 'City in the Country'™ and instead have set out the housing for another mass produced, green field housing estate. This is particularly worrying as it is the council that has produced it. Surely it gives a very strong message to developers that the council has very little ambition for its urban design. Thinking of any other cities with such central sites, especially ones with large amenity space adjacent or nearby, there would certainly not be suburban housing proposed.

'Engine Shed'™

There are semi detached houses hard up on the railway. I think this is both cruel and a waste of space. As a train user I am always disheartened at the view into the back gardens (often with rubbish tipped over the boundary) and wonder why those spaces weren't used for back service lanes or, better, screened by trees to give both the railway users and the house owners space.

There is also no relationship with the trees and it is surprising there appears no bigger idea, given the treed context, to govern the layout of the proposed housing. Why are there back gardens proposed when there is a wood adjacent and a river a few minutes walk away. The trees should be seen as the amenity of the site both as a buffer to the railway and a communal back garden.

Given the inevitable rumble of articulated lorries along the Lower Road the semi detached houses hard up on the highway also seem ill-considered.

The corner should be edged but still the opportunities of the site are not being exploited. Instead the western edge should be built up with housing as there is opposite and there should be much large blocks of housing (with parking and or commercial under) onto Lower Road.

Site 2 'Live Work'

This is more appropriately urban but again it seems the designers have simply filled the gardens with parking.

With the river a few feet away I have to wonder why there is so much empty space on this site.

Surely the live work units should be more like Fournier Street in Spitalfields (with shops on the ground floor and weaving studios on the roof) and less like a 1980's 'Office Park'.

If there is to be a central green space it should be treated much more precisely and precious (without cars taking centre stage) and some idea of orientation and community driving it.

Site 3 'Depot / Recycling Site'

These two schemes begin to address the adjacency to the industrial park on one side and the river on the other. They should, however, combine the two ideas (of larger blocks facing the industrial estate).

Again, the housing wants to be far more dense with some better relationships to the views, wooded areas and public access. The housing now looks like a ghetto of semis trapped inside a few 1950's apartment blocks. Instead the buildings facing the industrial estate want to be robust and act as blockers to protected spots behind. Maybe these are also live work. And if there are more houses along the river walk then these should address more positively the view and adjacency to the river. Is the 'pocket park' public or a park of the housing? If it is, as I suspect, private, then that idea should wrap around the south side of the site AND inform how the sites of housing either end are designed. The pocket park is a bit perverse (as it is adjacent a spectacular river walk) but surely it is the green space of the development and the mean back gardens of suburbia can be jettisoned.

A shame really that the council has set the bar so low.

I hope this helps

John Comparelli

NDP response

Respondent comment

"Just to reiterate importance of:

1) the opportunity to make the park around Churchfields/the river more accessible. At present the main points of access are poor. In the east of the site it is unwelcoming/underwhelming/has no natural surveillance/feels unsafe. The main entrance to the west is better but is still accessed through Churchfields and the treatment is generally poor quality (single bar gate, chain link fence, kayak club building etc. in poor condition). There is an informal access in the north western corner of Churchfields that is where (as I understand/through experience of living locally) is where most people access the park and it has not benefitted from any form of path work to formalise it/improve access. Speaking generally about access to the park around Churchfields/the river - this needs to be more prominent and accessible directly from Churchfields Rd ... good connections to/from the station and city - and to/from Bemerton, etc.

2) where possible, a greener/21st century face to Churchfields Rd ... trees, planting ... SuDS - and generous footpaths, cycle lanes, and pedestrian/cycle priority for crossings

From scanning through the document it seems the proposals are appropriate and I welcome them."

The proposal assumes that the site can be cleared for the "future vision" but it is likely to be decades before it can start to be dealt with as the ownerships are so complex and so many businesses have to be relocated without any feasible alternative. If it can go ahead with some of the existing businesses staying in situ there is still a fundamental issue about access to Churchfields through the city by large vehicles which is so detrimental to it.

I don't at all mind regarding the wording of this document. I mind a great deal about what it proposes. I live just off Cherry Orchard lane and am shocked to discover a plan to turn the Churchfields Estate into a housing scheme. Where will the businesses go? Where will the traffic entering the estate go?! Along the Wilton Road which is already a nightmare, down Cherry Orchard Lane which is a traffic jam every morning and evening? Through the quiet village of Lower Bemerton?!!!!!!! Have you even walked or cycled this area at all?!!!!! It is bad enough as it is. This will have a direct impact in terms of air pollution, noise pollution, footfall all of it on the lives of myself and my neighbours. There is a lovely nature reserve around Churchfields - what will happen to all the wildlife there and to the water. Yes the Churchfields estate is already an eyesore, but why make it even more built up? Where will all the cars from the estate go in order to get into town? Round Elizabeth Gardens??!! Unless you dictate that no-one living on the estate can own a car you are just going to create one hellish, polluting, noisy grid lock of a monster housing development - for what? What a totally ridiculous idea... I thought this was about sustainability, greening the city and so on. Not about more development, more concrete, more building!!?? I'm horrified.

Make it into a park....or a massive market garden, or an orchard... re-wild the whole lot

The work you've put into this and the suggestions for how the site might be developed if it were to become residential are excellent. But you're going about it in the wrong order. Churchfields is daftly sited and produces way too much HGV traffic through the centre, but it's a vital economic resource for the city, and there's no sensible plan for where all those businesses (or the recycling centre) are feasibly going to go. The only other place in Salisbury where one can find these sorts of commercial facilities (builders merchants of all kind, car services & retail etc) is the Southampton Road, which is a nightmare and can't take any more traffic. Most of them are too big and have too much bulky stock to stack as suggested in the document. Then there are all the small businesses making things whose suppliers are conveniently nearby.

Instead of trying to gentrify a vital part of Salisbury's economy, could the Plan identify some sites these shops and industries could move to and develop those first? At the consultation event online, High Post was suggested, but most of the retail outlets wouldn't survive that far out. There seems to be no reason the council depot or the factories in the south-west corner need to be here specifically. But most of the rest of Churchfields supplies the western, northern and central parts of Salisbury with goods and services which need to be easily accessible, not stuck on the other side of a permanent traffic jam on the Southampton Road or half-way to Amesbury.

If you could start by trying to meet the needs of the businesses and the local economy for a better and more convenient site, and develop the spaces which are left after some of them have moved, the rest is very good and I would support it. Until then, I don't think the redevelopment of Churchfields is something to aim for.

I love the vision for Churchfields but I think this document is full of good general design principles and suggestions without a realistic plan of how an industrial estate that is currently dependent on dozens of HGV deliveries every day is to be transformed to a low carbon, sustainable, mixed residential and workplace area accessed largely by cycle or on foot. I live in Lower Bemerton and risk my life on a bicycle on Churchfields Road every day. Not surprisingly most residents of my village are not prepared to do this and I can't see this changing until most or all of the HGVs have gone or there is a separate, dedicated cycle path right through to Fisherton Street and/or the High Street. The walk into town along Churchfields Road is also very unappealing. This will also apply to any future residents of Churchfields. The other glaring omission with all the plans for Churchfields redevelopment is where all the existing businesses and the Council depots are going to relocate to, somewhere where they are still accessible to city residents, including those without a car. This is fundamental to giving this plan any credibility.

Where is the employment going to be?? Does the council realize people need to actually work to be able to afford to live here. Where are businesses going to go??

Key suggestions are these:

1) The possibility of a footbridge/cycleway link across the River Nadder into Churchfields needs to be fully explored. With the current developments already underway or planned for Harnham and with the sub-standard nature of Town Path it would seem essential that an additional link be provided in order to allow for sustainable travel to/from Churchfields and the City/Harnham. E.g. a link from Middle Street Meadow (in SCC ownership).

2) HGVs accessing Churchfields blight not just the industrial estate, which is not built for them (particularly given the size of current HGVs) but also the access routes under Fisherton Bridge and (for overheight HGVs) through the heart of the city (New Street, Mill Road etc). Suggestions such as a decant centre on Wilton Road have come to naught due to lack of a suitable site. It is time to give due notice to businesses that they will need to consider (over a suitable period - e.g. 10 years) how or if they can manage with smaller lorries. Maybe a few under Fisherton Bridge will be acceptable (although note Air Quality exceedances on South Western Road), but overheight HGVs in the heart of the city are not. If businesses wish to stay in Churchfields they should be required to make alternative arrangements.

Salisbury & particularly Churchfields is not London. It looked like generic housing to me to be honest.

I didn't like it really, sorry.

It would be useful to know if there is a minimum and maximum number of houses that are required to be built, and the same for the industrial workshops. For each design there should be provided the number of houses and industrial workshops that they include.

Where are the sites for the existing industrial units to move to. Will they be accessible by public transport to reduce car use?

NDP response

